

SIF PERSONAL DATA PROTECTION POLICY

Background

The General Data Protection Regulation applies to the processing of personal data in the Union as of 25 May 2018. To be compliant with the provisions of the General Data Protection Regulation, SIF has amended its Data Protection Policy accordingly and therefore complies with Dutch and European legislation.

For its daily functioning SIF collects and processes personal data of data subjects. To ensure a high level of protection of personal data, SIF's Data Protection Policy clarifies which personal data SIF processes, where to SIF processes personal data, and the control data subjects have of their own personal data processed by SIF.

SIF's Data Protection Policy refers to the processing of personal data of all data subjects within SIF, not only to members, affiliates and those active in SIF's professional units but also to its employees, guests, visitors and external relations.

SIF's Data Protection Policy focuses on the fully or partially automated processing of personal data which takes place under the responsibility of SIF and on the underlying documents contained in a file or which are intended to be included therein.

At SIF, protecting personal data is broadly interpreted. SIF aims to optimise the quality of the processing and the security of personal data with a balance between privacy, functionality and safety.

Definitions

Controller	SIF Board;
Data Subject	natural persons participating in SIF's professional units, employees of SIF, guests, visitors and external relations;
GDPR:	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC;
Processor	a natural or legal person, public authority, agency or other body which processes personal data on behalf of SIF;
Personal data	any information relating to data subjects;
Personal data breach	a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
Policy	this SIF Data Protection Policy;
Processing	collecting, storing and processing of data in the course of SIF's work, including for the purposes of advocacy, information and mobilisation. Management of payroll and personnel administration.
Secretary General	The Secretary General of IFLA or the person delegated into this role
Third party	organisation SIF has a working or cooperating agreement with.

Principles Processing Personal Data

SIF processes personal data in a lawful, fair and transparent manner

To do so SIF:

- processes personal data on one of the legal bases as mentioned in Article 6 of the GDPR, including on the basis of legitimate interest;
- collects personal data for specified, explicit and legitimate purposes that are in line with its mission as set out in its Statutes and does not process personal data in a manner that is incompatible with those purposes. In particular, SIF processes further data in the context of:
 - Engaging with individuals who have indicated an interest in the programme and its activities, in order to maintain contact and share resources
 - Recruitment of staff, in order to work with candidates and manage human resources
 - Maintain contacts in support of carrying out relevant research

- when processing personal data the amount and type of data remains limited to the personal data necessary in relation to the purpose. The data shall be adequate, relevant and not excessive for the specific purpose;
- processes personal data in the least significant manner and in a reasonable proportion to the intended purpose;
- takes measures to ensure, as far as possible, that the personal data to be processed, is accurate and up to date;
- protects personal data adequately according to the applicable security standards;
- processes personal data no longer than necessary for the purposes of the processing, in accordance with the applicable storage and destruction periods taken;
- offers any data subject the right to inspection, improvement, addition, removal, respectively or foreclosure of the personal data contained in the individual processes, and has the right of objection as formulated in this policy;
- offers the data subject an unambiguous so-called opt-out procedure in all voluntary registrations.

Role and Responsibilities regarding processing personal data

In order to make the coherence of the data protection organisation consistent and to align the initiatives and activities in the area of processing personal data, SIF recognises a number of roles that are assigned to its staff.

Governance and compliance, as well as objectives, scope and ambition in terms of privacy aspects, are discussed at a strategic level. The applicable body at strategic level is the SIF Board.

At tactical level, the strategy is translated into plans, standards to be used, and evaluation methods. These plans and instruments govern the implementation of the policy. The applicable body at tactical level is the IFLA Secretary General or whoever is acting in this role.

At the operational level, the issues are discussed which concern the day-to-day operations (execution). Employees of SIF and those working on its behalf are responsible at the operational level.

SIF Board

The SIF Board is ultimately responsible for the lawful and careful processing of personal data and establishes the policy, measures and procedures in the field of processing. The Board is regarded as the controller within the meaning of the GDPR.

Secretary General

The Secretary General or the person acting in that role is the Data Controller. They have the primary responsibility for the lawful and careful processing of personal data. This also includes the choice of measures and their implementation and enforcement. Furthermore the IFLA Secretary General is responsible for communicating the policy, measures and procedures to all relevant parties, or whoever is delegated to take on this role.

The contact details of the IFLA Secretary General for issues relating to this policy and its implementation are:

IFLA Headquarters
 Prins Willem-Alexanderhof 5,
 2598 BE The Hague, Netherlands
 PO Box 95312, 2509 CH The Hague, Netherlands
 Tel +31 70 3140884
 Email ifla@ifla.org
 Website www.ifla.org/hq

System owner

The system owner is responsible for ensuring that the application and associated ICT facilities provide a good support to the process for which it is responsible and meets the policy. The system owner ensures that, both now and in the future, the application continues to meet the requirements and wishes of data subjects and laws and regulations.

Employees and Contractors of SIF

Careful dealing of personal data is everyone's responsibility. Employees and contractors are expected to behave incorruptibly. SIF does not accept that unsuitable behaviour creates unsafe situations that lead to damage to SIF or to data subjects.

Legal and Careful Processing of Personal Data

Processing personal data is based on one of the legal grounds as described in Article 5 of the GDPR.

SIF may process the following details of individuals involved in its events and wider networking:

- name;
- postal address;
- email address;
- website address [if available];
- social media names;
- telephone numbers.

SIF Processes the following (special category) personal data of its employees and contractors:

- contact details;
- bank account details;
- copy of identity document.

Special Categories of Personal Data

SIF may process passport or visa information of those involved in the Programme in line with the appropriate grounds as outlined in Art 9 of the GDPR.

Use of Personal Data

Personal data is collected by SIF as provided either directly, through registration for webinars, or in other situations such as meetings and spontaneous contacts:

Personal data will not be further processed in a manner that is incompatible with the purposes for which SIF obtained the information.

SIF takes the necessary steps to ensure that personal data, in view of the purposes for which they are collected or subsequently processed, are accurate.

SIF applies the principles "Privacy by Design" and "Privacy by Default" in implementation.

SIF's legitimate interests relate to processing that is in line with the achievement of its missions as set out in its Statutes, and in order to fulfil its commitments under agreements into which it has entered. The principle that all processing shall be necessary shall apply

The organisation of the security

SIF carries out an adequate level of security and implements appropriate technical and organisational measures to protect personal data against loss or against any form of unlawful processing. These measures are aimed at preventing unnecessary or unlawful collection and processing of personal data.

A risk analysis on privacy and information security is part of the internal risk management and control system of SIF.

Confidentiality

At SIF all personal data is classified as confidential by default.

Also persons who are not already subject to confidentiality by virtue of their duties, occupations or statutory requirements are obliged to confidentiality of the personal data which they acquire through their work with SIF, except insofar as any legal requirement obliges them to be notified or the necessity for disclosure results from their duties.

Storage periods / destruction periods per species given

Personal data are no longer stored than necessary for the purposes for which they are collected or used. Personal data will be removed from the scope of the active administration after no more than two years of inactivity.

Transfer of personal data to third parties

Sub contracting to an processor

If personal data is processed by a processor, processing is arranged in a written agreement between SIF and the processor.

Transfer personal data outside the European Union (including the EEA)

As an international organisation, it may be necessary for SIF to share personal data with third-party partners both inside and outside of the European Union in order to fulfil its objectives.

The Dutch government has identified countries outside of the EU that in its opinion lack adequate personal data protection laws. Personal data may be sent to these countries over the course of membership, where there is no other option in order to provide adequate processing. In such cases, recipients of data shall sign data processing agreements committing them to compliance with the standards set out in this policy and EU law, and every effort shall be made to share information through encrypted channels.

With regard to special categories of Personal data, these will not be disclosed to third parties without the explicit consent of the data subject.

Data Retention

Personal data is not held for any longer than necessary for processing under this agreement, for example once a position has been filled or otherwise for the duration of the programme, unless there is explicit consent by the data subject.

Personal Data Breaches

Any question, complaint or notice regarding the processing of personal data within SIF is regarded as an incident. The most notorious form of such an incident is a personal data breach.

Message and registration

Data subjects, processors or third parties can report an incident. Incidents are to be reported to the IFLA Secretary General. SIF keeps a record of each incident and the way the incident is dealt with. The reporting on personal data incidents therefore forms part of the annual report of the Board.

SIF acts accordingly with the procedure laid down for that purpose, which can be found in the annex to this policy.

In any event, if the personal data of the data subjects or business processes, the finances or the proper name of SIF are at risk, the IFLA Secretary General will inform the Board.

Personal data breaches are reported in accordance with the specific provisions concerning personal data breaches set by the Autoriteit Persoonsgegevens.

Rights of the Data Subject

Disclosure

SIF informs its data subjects about their rights by means of general notice at its website. In addition, SIF aims in accordance with law and regulations, to provide rights to certain circumstances to data subjects to protect their personal data.

SIF provides data subjects also with the following information:

- the existence of the right to request from SIF access to, and rectification or erasure of, personal data concerning the data subject;
- the right to file a complaint with the Autoriteit Persoonsgegevens;
- the recipients or categories of recipients of the Personal Data, if any.

Announcement of adjustments policy

If this policy is substantially amended or changed, SIF shares this generally, to ensure careful and proper processing.

Right to inspection

Members may inspect their own personal data through the online SIF membership system, and, where incorrect, may modify, correct, supplement or remove them.

This can be done free of charge.

Communication

The statement of SIF regarding processing personal data contains a complete overview thereof in an understandable form, a description of the processing purposes, the categories of personal data to which the processing relates, and the categories of recipients, as well as available information about the origin of the personal data and time limit for data retention.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her. SIF shall no longer process the personal data unless SIF demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

If the answer of SIF does not lead to an acceptable result, the data subject has the opportunity to initiate a petition procedure with the relevant court.

Finally

This policy has been determined by the Board of SIF, XXXX 2022.

Changes to this Policy will be announced via the website of SIF.

Relevant laws and regulations

General Data Protection Regulation

SIF has implemented the legal requirements and taken appropriate technical and organisational measures against loss and unlawful processing of personal data implemented by this policy.

Archives Act

SIF complies with the requirements of the Archive Act on how to deal with information recorded in (digitized) documents, information systems, websites, etc.

Telecommunications Act

The measures taken by SIF to comply with privacy laws are also sufficient to ensure the privacy of users on public networks. The regulations of the Telecommunications Act in relation to the authorised drainage and storage obligation have been implemented separately.

=====