#### WACC POLICY

# DATA PROTECTION AND CONFIDENTIALITY

Issued by the General Secretary

2021

#### General

- 1. This policy is supported and complemented by the WACC Data Privacy Policy.
- 2. This policy applies to all personal and corporate information held by or on behalf of the WACC Secretariat, whether it is in on paper, stored electronically, or otherwise retained.
- 3. WACC maintains personal information regarding individuals and potentially sensitive information about organisations as a necessary part of carrying out its activities. The Association recognises that such information must be stored and processed in an appropriate manner, consistent with the legal requirements for data protection that apply in the various jurisdictions in which it operates.
- 4. All staff, as a condition of employment, and all volunteers assisting in the work of the Secretariat are required to treat as confidential any information relating to WACC, its employees, its volunteers, its members or its funders that they may acquire during their employment or as a result of volunteering with WACC.

#### Security

- 5. Those processing personal or sensitive information are required to ensure that the data is not used in a manner inconsistent with the purpose for which it was obtained.
- 6. Those who are authorised to access personal or sensitive information must take all reasonable precautions to prevent access by those who are not so authorised. This includes, but is not limited to:
  - a. Ensuring that physical records are not lost,
  - b. Keeping passwords used for accessing computer systems confidential, and
  - c. Not permitting access to computer systems by unauthorised personnel.
- 7. Those who are authorised to access personal or sensitive information are prohibited from accessing such information unless it is required in the performance of their duties.
- 8. Physical and electronic security measures are taken to limit access to certain information, and staff and volunteers are prohibited from attempting to circumvent such measures.

# **Data Collection**

- 9. Except in the case of employees and volunteers, WACC will normally only collect and store such personal information as is required to facilitate identification of and contact with individuals or that relates directly to membership in the Association.
- 10. Additional information may be requested in support of an application for membership, for financial support, or for employment and for consideration as a volunteer.
- 11. Records of payments made to WACC for any purpose, including membership subscriptions, subscriptions to publications, and financial contributions to the work of WACC will be maintained.
- 12. Records of payments made by WACC for any purpose, including in support of projects, and for the purchasing of services and equipment will be maintained.

# **Data Retention**

- 13. Records of interactions between WACC and individuals or organisations will be maintained.
- 14. Data related to individuals which is obtained by WACC in conjunction with its activities will not be retained deliberately beyond the period during which such information is of value to the Association, including meeting the requirements of funders or government requirements.
- 15. All reasonable efforts will be made to ensure that personal information is kept up-todate.

# **Sharing of Information**

- 16. Each Member or Affiliate of WACC is also a Member or Affiliate of the Regional Association for the geographic region in which he or she resides. The official membership and affiliation records are retained by the WACC Secretariat, and the information contained in these records is made available to the appropriate Regional Association to allow it to fulfil its obligations to WACC, to its Members and to its Affiliates.
- 17. Information regarding Members, Affiliates, and applicants for membership or affiliation are shared between WACC and the appropriate Regional Association. Where such information has been obtained by a Regional Association and transferred to WACC Secretariat, the information must be treated as though it had been obtained directly by WACC.
- 18. WACC will not make available its membership lists or lists of contacts to any third party for commercial purposes.

### **Personal Information**

- 19. Any individual is entitled to review personal information, and any organisation is entitled to review sensitive corporate information, held by WACC which relates to them. Any request to review such information is to be directed to the Manager of Administration.
- 20. Any individual is entitled to have personal information, and any organisation is entitled to have sensitive corporate information, regarding them removed from or, when appropriate, modified in WACC records, unless such information is necessary to meet the requirements of a funder or to comply with government regulations. Any request for such action is to be directed to the Manager of Administration.

### **Release of Information**

21. The release or transfer of any information that is covered by this policy, unless expressly authorised, is only permitted with the approval of the General Secretary.