

Data Processing Rules

For Local UNAs



UNA-UK

APRIL 2018



DATA PROCESSING RULES

These Rules are handed down by:

UNITED NATIONS ASSOCIATION – UK – ("UNA-UK").

1. Why do we need these Rules?

Data protection laws impose obligations on all organisations that receive, use and store personal data. This document has been produced to assist Local UN Associations ("Local UNAs") in meeting these obligations. It contains a glossary of terms, as well as practical guidance on the steps you need to take to be compliant.

As a Local UNA, you carry out activities to support the aims, values and work of the United Nations and UNA-UK. You may also receive certain information from UNA-UK to support you in these activities. We greatly value your involvement and seek to provide you with relevant guidance and other information you reasonably require to assist UNA-UK in furthering its charitable objectives. This may include sharing personal data with you which relates to UNA-UK members or supporters.

In order to ensure that UNA-UK and all Local UNAs are compliant with data protection laws, it is important that you follow the obligations set out in these Data Processing Rules, and in particular those under the "Use of personal data" section.

In addition, whenever you contact individuals for any reason, you must comply with the "Communications and Campaigning" section of these Rules. **This is the case whether you received those individuals' details from UNA-UK or whether you collected them yourself.**

Finally, you must comply with the "Confidentiality" section of these Rules at all times, when dealing with any type of information received from any source (unless it is publicly available).

Regulation around data protection is strict and any breaches of data protection law by you or by UNA-UK could expose both you and UNA-UK to large fines and other enforcement actions. Therefore we all need to take these requirements seriously - and we ask for your cooperation and assistance in ensuring we are compliant at all times. **If you have any questions on anything in these Rules, please contact us using the contact details included at the end of these Rules.**

Glossary

"**confidential Information**" means all information which relates to UNA-UK know-how, research, developments, methods and processes, suppliers, members, supporters and personnel which by its nature is confidential.

"**data protection laws**" means all laws, regulations, regulatory requirements, guidance and codes of practice, including the **General Data Protection Regulation ("GDPR")**, applicable to the processing of personal data.

"**data protection regulator**" means any person or organisation having regulatory or supervisory authority over UNA-UK or Local UNA data protection compliance in whatever jurisdiction, including the Office of the Information Commissioner.

"**data portability**" means the right for individuals to obtain personal data held about them by an organisation in a structured, electronic format, and to have that data transmitted to another organisation, under certain circumstances.

"**data protection impact assessments**" "**DPIAs**" are processes to help you identify and minimise the data protection risks of a project. You must carry out a DPIA for certain listed types of processing, or any other processing that is likely to result in a high risk to the interests of individuals.

"**Information**" for the purposes of these Rules, includes both confidential information and personal data.

"**member**" means an ordinary member of UNA-UK, noted as such on the register of ordinary members.

"**supporter**" means an individual who supports UNA-UK's work, either by donating or by taking part in activities to further our objectives.

"**technical and organisational measures**" are security measures used to protect personal data. These may include access control, encryption, firewalls, software patches, confidential bins, locked cabinets, security policies, training and segregation of data.

"**personal data**" means information that (either in isolation or in combination with other information held by us) enables an individual to be identified as an individual or recognised directly or indirectly.

"**Process**", "**Processing**" or "**Processed**" have a wide meaning and include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

"**Pseudonymisation**" means converting personal data into a form that means it can no longer be attributed to a particular individual without the use of additional information which is kept separately.

2. Use of personal data

If you receive from UNA-UK any personal data of individuals and use or store it, you must comply with the following Rules:

- UNA-UK will sometimes provide you with written instructions which will set out how you should deal with the personal data you receive. You must comply with these instructions promptly and must only use data in the ways set out in these instructions.
- You should tell UNA-UK immediately if you think that any instruction from UNA-UK infringes data protection law. However, you should continue processing the personal data as instructed unless UNA-UK tells you otherwise.
- You should not process personal data for any purpose other than to support the work of UNA-UK and only to the extent reasonably necessary for that purpose.
- You should not disclose the personal data you receive from UNA-UK to any employee, volunteer, contractor or affiliate or any third party except under circumstances where this is necessary to comply with law, or if you have UNA-UK's prior written consent.
- You should ensure that you implement appropriate technical and organisational measures (see glossary) to protect the security and confidentiality of personal data you use and store, and to protect personal data against accidental or illegal deletion or accidental loss, alteration, unauthorised disclosure, access, or use.
- Under data protection laws, individuals are given certain rights in relation to their personal data which they may enforce by submitting requests to the organisation holding their data. These rights include the right to access, rectify or delete personal data about them; restrict or object to the processing of their personal data; or the right to data portability (see glossary). If you receive any requests in relation to the personal data you received from UNA-UK, you should tell UNA-UK immediately. You should provide any necessary data and assistance to UNA-UK in order to deal with the request.
- If you suspect, or become aware of any accidental, illegal or unauthorised deletion, loss, alteration, access to, disclosure or use of personal data you should inform UNA-UK in writing immediately. You should include a description of the incident, likely consequences, the number of individuals affected, the number and the types of records affected, and how you propose to address the incident. You will need to co-operate fully with any associated investigation and you should do whatever you can to stop further unauthorised disclosure or use of personal data.
- You should provide UNA-UK with assistance if UNA-UK receives any complaints made by individuals or investigations or enquiries made by any data protection regulator.
- You should cooperate and assist UNA-UK with preparing any necessary data protection impact assessments (see glossary).
- You should co-operate if UNA-UK wishes to check your compliance with these Data Processing Rules. Such co-operation may include helping UNA-UK to carry out risk assessments of how you use the personal data and providing any requested information.
- You must not transfer any personal data outside the UK and/or the European Economic Area without the prior written permission of UNA-UK.
- If UNA-UK asks you to, you should delete or return to UNA-UK any personal data processed on behalf of UNA-UK, and delete any existing copies (unless you are obliged to keep any of the data to comply with other laws).
- You must not send the personal data to any organisation nor allow another organisation to use any of the personal data you receive from UNA-UK without the prior written consent of UNA-UK.
- You must ensure your members have understood and comply with the Data Processing Rules.

3. Confidentiality

UNA-UK may sometimes send you confidential information. You must keep all such confidential information confidential, secure and protected against theft, damage, loss or unauthorised access.

If any unauthorised disclosure, misuse, theft or other loss of confidential information occurs, you must inform UNA-UK immediately - even if this happened accidentally.

You must only allow access to the confidential information to members of your Local UNA on a strictly need to know basis. You must not disclose it to anyone outside of your Local UNA without UNA-UK's prior written consent.

If you are required by law to disclose any confidential information, then you must inform UNA-UK immediately in writing of the reasons why you need to disclose it, and who you need to disclose it to, and consult with UNA-UK as to steps to minimise or avoid the disclosure.

If UNA-UK asks you to, you should return or delete (as directed) any and all UNA-UK confidential information in your possession.

4. Communications and Campaigning

It is likely that you, as a Local UNA, use personal data for communications or campaigning purposes - for example, using contact details to encourage individuals to attend an event or donate to UNA-UK. This may entail using personal data you collect yourself, or personal data you receive from UNA-UK.

It is important not to send communications to people who do not want to be contacted. If you have collected the data yourself, you must be able to demonstrate that the individual has requested to receive communications. If you received an individual's contact details from UNA-UK via a membership or supporter list, you can assume that the individual has requested to receive communications.

CONTACT DETAILS

- **By post** to UNA-UK, 3 Whitehall Court, London, SW1A 2EL
- **By email** to info@una.org.uk

- Ensure that everyone you contact has "opted in" to receiving communications. For example, in relation to:

- "sign-up" membership sheets used at events (e.g. university freshers fairs, meetings, talks and conferences); or
- online competitions where personal data is collected,

accompanying wording should be included asking individuals whether they want to receive communications from you. An opt-in mechanism such as empty tick boxes should be included alongside where their details are inserted, so that they can indicate their wish to receive different types of communication. The wording should specifically describe the types of communications and campaign materials which would be sent. The ability of the individual to sign up for membership/take part in the competition must not be affected by their decision not to receive communications.

- Keep a list of the preferences of all individuals and stick to it! For example, someone may want to receive invitations to events but may not want to receive newsletters. They should be able to sign up to the type of communications they would like to receive and only receive that sort of communication. They should also be able to change their preferences at any time.
- Ensure that all communications (both electronic and sent by post) include either an unsubscribe link, or clear instructions on how to unsubscribe or change preferences (e.g. the contact details of the person who can effect this). You must keep an up-to-date suppression list so that if anyone unsubscribes you can be sure not to contact them again. Don't just delete their details, as you may inadvertently contact them again in the future.
- If an individual whose details were originally provided to you by UNA-UK gets in touch with you asking not to be contacted any more, or to change their preferences, you should tell UNA-UK as soon as possible.

If you have any questions about your obligations, please contact us on the details opposite.

You should also use these contact details if you need to inform us about any issue that has or may arise in relation to your compliance with data protection laws.