

# Privacy Policy

## Regulations

## Woord en Daad Foundation

PRINCIPAL Woord en Daad Foundation

INITIALS FOR APPROVAL

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## Table of Contents

<b>Privacy Policy Woord en Daad Foundation .....</b>	<b>2</b>
<b>Legal frameworks for dealing with data.....</b>	<b>3</b>
<b>Starting points.....</b>	<b>3</b>
<b>Mission .....</b>	<b>3</b>
<b>Vision.....</b>	<b>3</b>
<b>Core Values .....</b>	<b>3</b>
<b>Legitimacy, fairness, transparency.....</b>	<b>3</b>
<b>Basis and purpose limitation .....</b>	<b>3</b>
<b>Data minimization .....</b>	<b>3</b>
<b>Retention period .....</b>	<b>4</b>
<b>Integrity and confidentiality.....</b>	<b>4</b>
<b>Sharing with third parties .....</b>	<b>4</b>
<b>Subsidiarity .....</b>	<b>4</b>
<b>Proportionality.....</b>	<b>4</b>
<b>Rights of data subjects .....</b>	<b>4</b>
<b>Privacy Regulations Woord en Daad.....</b>	<b>5</b>
<b>Legislation and definitions .....</b>	<b>5</b>
<b>Scope .....</b>	<b>5</b>
<b>Data Protection Officer .....</b>	<b>5</b>
<b>Processing (Article 4, GDPR).....</b>	<b>6</b>
<b>Purposes (Article 5, GDPR) .....</b>	<b>6</b>
<b>Legitimate basis (Article 6, GDPR) .....</b>	<b>6</b>
<b>Method of Processing .....</b>	<b>7</b>
<b>Transfers (Article 44 to 50, GDPR) .....</b>	<b>7</b>
<b>Transparency and communication.....</b>	<b>8</b>
<b>Automated processing.....</b>	<b>9</b>
<b>Obligations of Woord en Daad .....</b>	<b>9</b>
<b>Conclusion.....</b>	<b>10</b>

# Privacy Policy

## Privacy Policy Woord en Daad Foundation

In The Netherlands, Woord en Daad regularly works with personal data of employees, sponsors, donors, and many committed volunteers. In addition, Woord en Daad works worldwide with data of donors, sponsor children and partner organizations. New technological developments, innovative facilities and globalization call for new requirements and pose different challenges to the protection of data and privacy.

Woord en Daad goes along with these new developments. This means that we process more information to be able to continue to carry out our tasks and activities properly, with a view to the future. We choose to store as little personal information as possible, out of respect for the privacy of people worldwide. On the other hand, personal information is precisely what connects us. Woord en Daad is aware of this tension.

We have to deal with this tension, for instance, in the Sponsor programme, in which Dutch sponsors support children living elsewhere in the world. From the perspective of Woord en Daad, this support benefits from personal contact. To achieve that, mutual sharing of information is needed.

In the Communication and Fundraising department, we encounter this tension as well. Woord en Daad can only exist thanks to our committed supporters. By our communication, we want to connect with each target group: families, young people, men, women, schools, churches, companies et cetera. To this end, we want to monitor the different developments and interests in these groups. When people join a field visit, we will have to share data across the borders of the European Union, for reasons of security.

Finally, within projects – such as the Job Booster programme – we encounter similar issues. We would like to know how many young people get a job, but also: what do they earn there, whether they work under safe conditions, and whether their income situation improves sustainably. Therefore, throughout the entire project we use people's names to get a picture of developments over a longer period of time.

In view of this tension, Woord en Daad will carefully balance up to what extent we find it justified to collect, process and store information. We always keep an eye on the aims of registering personal data and work in compliance with the law.

Each data subject can therefore rely on Woord en Daad to deal carefully and safely with their personal data. Woord en Daad ensures that privacy is guaranteed, including through measures in the field of information protection, data minimization, transparency and user control.

The Board of Directors plays a crucial role in ensuring privacy. By means of this policy, Woord en Daad gives a clear direction to privacy and shows that it guarantees, protects and sustains privacy. This policy applies to the entire organization, all processes, organizational units, objects and data collection of the Foundation. This Privacy Policy of Woord en Daad is in line with the relevant local, regional, national and European laws and regulations.

## Legal frameworks for dealing with data

Woord en Daad is responsible for developing, implementing and enforcing the policy. Therefore, the following legal frameworks apply, among others:

- Dutch Personal Data Protection Act (In Dutch: Wbp), since 25 May 2018 replaced by the European regulation: the General Data Protection Regulation (GDPR)
- Implementation Act General Data Protection Regulation.

## Starting points

Woord en Daad Foundation deals with personal data in a secure manner and takes the privacy of involved parties very seriously. The Mission, Vision and Core Values of Woord en Daad form the basis of the policy.

## Mission

In a broken world, characterized by poverty and injustice, Woord en Daad strives for visible signs of God's coming Kingdom. From the Biblical perspective on righteousness and compassion, we seek to contribute daily to a sustainable change for people here and there.

## Vision

As a biblical Dutch foundation, Woord en Daad, together with local partners and actors from relevant sectors, connects people worldwide. We want to take responsibility for shaping a dignified existence for poor and rich, creating hope and opportunities to overcome poverty.

The Mission and Vision form the basis of the following Core Values of Woord en Daad:

## Core Values

- Co-responsibility – responsible for yourself, your fellow human being and creation;
- Co-creature – creature of God, both equal and unique;
- Compassion – close and near people who suffer;
- Stewardship – dealing carefully with people, resources and environment;
- Interdependence – independent in choices, dependent in cooperation.

Concerning this Privacy Policy, the above-mentioned Mission, Vision and Core Values ensure the following principles.

## Legitimacy, fairness, transparency

Personal data are processed in accordance with the law and in a fair and careful manner. Woord en Daad is transparent about the processing of personal data: when sharing your data, we mention that we store them. The Privacy Statement states what information we collect from whom and for what reason they are used. You can retrieve your data anytime.

## Basis and purpose limitation

Woord en Daad ensures that personal data are collected and processed only on the basis of a legitimate purpose. Personal data are only processed on a legitimate basis.

## Data minimization

Woord en Daad only processes personal data insofar necessary for the predetermined purpose. Woord en Daad aims at minimal data processing. If possible, less or no personal data are processed.

## Retention period

Personal data are not stored longer than necessary. The storage of personal data may be necessary for carrying out activities properly or to comply with legal obligations. Within Woord en Daad, each organizational unit has documented their retention periods of processed personal data and on what basis this is done.

## Integrity and confidentiality

Woord en Daad handles personal data with care and treats it confidentially. Personal data are only processed by persons with a requirement of confidentiality and for the purpose for which these data were collected. In doing so, the Foundation ensures appropriate protection of personal data. This protection is documented in the ICT Policy.

## Sharing with third parties

In case of cooperation with external parties, involving the processing of personal data, Woord en Daad makes agreements about the requirements that data sharing must comply with. These agreements comply with the law. Woord en Daad verifies these agreements every three years. The privacy of the sponsors and the target group in the South is guaranteed.

## Subsidiarity

Woord en Daad cannot and will not merely collect and process data. The right of ownership and the right of use of personal data is as close to the person concerned as possible. To achieve the purpose for which the personal data are processed, infringement of the data subject's privacy is limited as much as possible. Some data must be kept according to the law, such as payment details. Other data are needed to continue to function properly, such as information about the training of employees. Subsidiarity means we weigh our interests, rights and obligations against the interests of the data subjects and that, where possible, we ask permission to process data.

## Proportionality

The infringement of the interests of the data subject may not be disproportionate in relation to the purpose of the processing. Proportionality means we weigh our interests, rights and obligations against the interests of the data subjects and that we do our best to collect and process only those personal data that we need to achieve our objectives in the fight against poverty and in connecting people worldwide.

## Rights of data subjects

Woord en Daad honours all rights of all parties involved. The various rights of the data subjects are specified in the Privacy Regulations.

This Privacy Policy comes into force after adoption by the Board of Directors. The Policy will be reviewed every five years and revised if necessary. Adjustments to this policy are announced by mail. The latest version of the policy can be found at <https://www.woordendaad.nl/wie-zijn-wij/beleid-en-verantwoording>

Thus adopted by the Board of Directors of Woord en Daad on 16 May 2018.

Rina Molenaar  
Board of Directors

Jan Lock  
Board of Directors

## Privacy Regulations Woord en Daad

In these regulations, Woord en Daad shows how it deals with personal data and privacy on a daily basis, and what is legally justified or not.

Organizations are obliged to handle the collection, storage and management of personal data of data subject in a careful, secure, proportional and confidential way. The protection of privacy is complex and is becoming increasingly complex due to technological developments, major security challenges and new European legislation. For these reasons, we find it important to be transparent about the way in which we deal with personal data and how we guarantee privacy.

### Legislation and definitions

At present, each Member State of the European Union has its own privacy law, based on the European Directive of 1995. The Dutch Personal Data Protection Act (in Dutch: Wbp) regulates the legal framework for dealing with personal data in The Netherlands. On 25 May 2018, the Wbp expired and the European regulation GDPR (General Data Protection Regulation) came into force, in combination with the Implementation Act. The GDPR builds on the Wbp and, among others, reinforces and extends the privacy rights with more responsibilities for organizations.

The next definitions are used in the GDPR (Article 4, GDPR):

**Data subject:** The person whose data is concerned. The data subject is the person whose data is processed.

**Processor:** The person or organization that processes personal data by order of another person or organization.

**Personal data:** All data that deal with persons and by which you can identify a person as individual. This not only concerns confidential data, such as someone's health, but any data that can be traced to a specific person (for instance name, address or birth date). In addition to ordinary personal data, the law also deals with special personal data. These are data on sensitive issues, such as ethnic background, political preferences or the citizen service number (BSN).

**Data protection impact assessment:** The data protection impact assessment assesses the effects and risks of the new or existent processing related to the protection of privacy. This is also called a Privacy Impact Assessment (PIA).

**Controller:** A person or authority that determines, alone or in together with another person, the purpose and the means for the processing of personal data.

**Processing:** Processing refers to all that is done with personal data, such as: recording, storing, collecting, combining, providing to a third party, and destroying data.

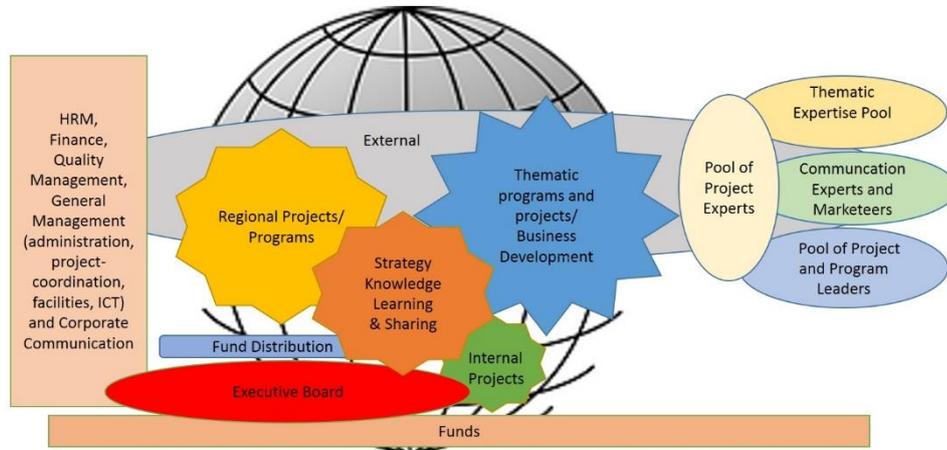
### Scope

The regulations apply to all processing of personal data by all organizational units, as well as the Project Pool of Woord en Daad. In other words: all processing that take place within Woord en Daad.

### Privacy Officer Officer

The Board of Directors, all organizational units, and the Project Pool of Woord en Daad are all responsible for the processing taking place by or on behalf of Woord en Daad. Below, you find the organizational structure of Woord en Daad. It shows the organizational parts within Woord en Daad.

## METHOD OF WORKING WOORD EN DAAD



### Processing (Article 4, GDPR)

The processing of personal data refers to each operation or set of operations with personal data, whether or not performed through automated processes. Within the GDPR, processing refers to:

- Collection, recording and organisation;
- Storage, updating and adaptation or alteration;
- Request, consultation and use;
- Providing by means of forwarding;
- Distribution or any other form of making available;
- Combining, aligning;
- Restriction, erasure or destruction of data.

This list shows that anything you do with personal data is a form of processing.

### Purposes (Article 5, GDPR)

According to the law, personal data may only be collected for a specified purpose. Woord en Daad only collects personal data if a purpose has been explicitly specified for it. The purpose is outlined and justified in the processing registers of the various controllers. Personal data may not be processed for other purposes than for which what they were collected. For the implementation of certain laws, as included in the Dutch Civil Code, the purposes for processing are already established by law, as are the personal data that may be requested and processed.

### Legitimate basis (Article 6, GDPR)

For each processing of personal data, a lawful basis from the law applies. That means that processing of personal data within Woord en Daad Foundation may only take place if:

1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
2. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
3. processing is necessary for compliance with a legal obligation to which the controller is subject;

4. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
5. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
6. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

### Method of Processing

The main rule concerning the processing of personal data is that it is only allowed in accordance with the law, and in a careful manner. Personal data are collected as much as possible directly from the data subject. The law is based on the assumption of **subsidiarity**. This means that processing is only allowed if the objective cannot be reached in another way. The law also mentions **proportionality**. This means that personal data can only be processed if they are proportionate to the objective. If the same objective can be reached with no or less (incriminating) personal data, this should always be the preferred choice.

Woord en Daad ensures that the personal data are correct and complete before they are processed. These data are only processed by persons with a requirement of confidentiality. Furthermore, Woord en Daad protects all personal data. This should prevent that personal data are consulted or changed by someone who has no right to do so. Who has access to which data is recorded in the authorization matrix with the above-mentioned procedure. Moreover, in all procedures of all organizational units the legislation as above mentioned in the GDPR is taken into account, when it involves the processing of personal data.

### Transfers (Article 44 to 50, GDPR)

The protection of personal data is not organized in the same way across all countries. Transfer of personal data from The Netherlands to another country is therefore allowed only if the country involved offers sufficient protection. For transfer of data to a country within the EEA, different rules apply than in case of transfer to a country outside the EEA.

Woord en Daad has three options in relation to the transfer of personal data: For each country the Foundation can choose for one of the following options.

**Option 1:**

Woord en Daad only transfers personal data to a country within the European Economic Area (EEA) or an international organization in accordance with the GDPR law.

**Option 2:**

Woord en Daad only transfers personal data to a country outside the European Economic Area (EEA) or an international organization based on agreements approved by the European Commission.

**Option 3:**

Woord en Daad does not transfer personal data to a country outside the European Economic Area (EEA) or an international organization.

## Transparency and communication

### *Information requirement (Article 13, 14, GDPR)*

Woord en Daad informs data subjects about the processing of personal data. When data subjects provide data to Woord en Daad, they will be informed about the way the Foundation will deal with the personal data. When data are obtained in another way, that is, not directly from the data subject, the data subject is informed at the moment that the data is processed for the first time.

### *Removal*

Woord en Daad does not store the personal data for longer than is necessary for the execution of operating activities. If personal data are stored that are no longer needed for reaching their purpose, these will be removed on a regular basis. This means that these data are destroyed or adapted so that the information can no longer be used for the identification of a person.

### *Rights of Data Subjects (Article 13 to 21, GDPR)*

The law not only determines the obligations of those who process the personal data, but also the rights of persons whose data are processed. These rights are also called the rights of data subjects, and consist of the following rights:

- Rights to information: Data subjects have the right to ask Woord en Daad if their personal data are being processed.
- Right of access: Data subjects have the possibility to check whether their personal data are being processed, and in what manner.
- Right to rectification: If it becomes clear that the data are not correct, the data subject can file a request with the Foundation in order to rectify the data.
- Right to object: Data subjects have the right to ask the Foundation to no longer use their personal data.
- Right to be forgotten: In cases where the data subject has given permission to process data, the data subject has the right to have the personal data erased.
- Right of objection: Data subjects have the right to object to the processing of their data. Woord en Daad will comply with such a request, unless the organization has legal obligations to process the data.

### *Filing a request*

The data subject can file a request to make use of his/her rights. This request can be submitted both in writing and via email. Woord en Daad has to assess whether the request is justified within four weeks from receipt of the request. The Foundation will let you know within four weeks what will happen to the request.

If the request is not followed up (in time), there is a possibility to file a complaint with the Dutch Data Protection Authority (DPA) or to file an objection with Woord en Daad itself. Making an objection to the Foundation itself creates the opportunity to enter into dialogue with each other.

On the basis of a request, the Foundation can ask for additional information to ensure the identity of the data subject.

## Automated Processing

### *Big data and Tracking*

Data may only be processed by means of big data research and tracking if they are not traceable to a natural person. In addition, they are only collected for research by, or on behalf of, Woord en Daad. The data collected by big data research and tracking are only the data collected by authorized persons. When the data are converted to a data set, data minimization will be applied. This means that only data that are really necessary for achieving the objective will be used. In addition, personal data can be pseudonymized so that they are not traceable to a person.

### *Website – Cookies*

Woord en Daad is working with cookies focused on analysis with respect to visitor behaviour and visitor demographics. These cookies are aimed at improving the website of Woord en Daad. The website gives information about the relevant cookies. Furthermore, permission is requested from the visitor concerned for the placing of cookies. The website will continue to function properly if cookies are not accepted, as in this case it does not concern functional cookies.

## Obligations of Woord en Daad

### *Records of processing (Article 30, GDPR)*

Woord en Daad is responsible for starting a record of all data processing for which the Foundation is the controller. Each record contains a description of what takes place during the processing, and what data are used, namely:

- The name and contact details of the controller and, if possible, the joint controllers;
- The purposes of the data processing;
- A description of the type of personal data and the associated data subjects;
- A description of the recipients of the personal data;
- A description of the sharing of personal data with a third country or international organization;
- The periods in which the different personal data must be deleted;
- A general description of the security measures.

### *Data Protection Impact Assessment (Article 35, GDPR)*

With a data protection impact assessment, the effects and risks of new and existing data processing are assessed in terms of privacy protection. Woord en Daad executes this when an automated processing or large-scale processing takes place. This applies in particular to processing where new technologies are used.

### *Appointment of a Privacy Officer*

Woord en Daad has appointed a Privacy Officer. The Privacy Officer is involved in all matters related to the protection of personal data. The tasks of the Privacy Officer are informing, advising, monitoring, raising awareness and acting as a contact person to the Dutch DPA (Data Protection Authority). It is not intended that the Privacy Officer takes over tasks in the area of data protection of the organizational units. The organizational units have their own responsibility in handling privacy-sensitive data properly. The Privacy Officer is responsible for structurally assessing the implementation and execution of the legal requirements and guidelines in the area of privacy.

For questions about privacy or about this explanation, you can contact the Privacy Officer of Woord en Daad via:  
Harmke van Ooijen  
H.vanooijen@woordendaad.nl

### ***Data Breaches (Article 33, 34, GDPR)***

We speak of a data breach when personal data fall into the hands of third parties that may not have access to these data. When a data breach has taken place, Woord en Daad reports this to the DPA without unreasonable delay, no later than 72 hours after learning about the infringement. If this is done later than 72 hours, an explanation for the delay will be added to the report. It is possible that the infringement involves a high risk for the rights and freedoms of the data subjects. In that case, Woord en Daad reports this to the data subjects in simple and clear language. To prevent future breaches, existing breaches will be evaluated.

The guidelines and the protocol about reporting a data breach are described in the 'Protocol and Procedure reporting data breach'.

### **Conclusion**

If Woord en Daad does not comply with a legal obligation, the data subject may file a complaint. It will be dealt with by the Privacy Officer. In cases not provided for in these regulations, the Board of Directors of Woord en Daad decides.