

WIMBIZ DATA PROTECTION AND ACCESS POLICY

INTRODUCTION

The Women in Management Business and Public Service (WIMBIZ/ The Organization), in compliance with the General Data Protection Regulations has drawn up this Data Protection Access Policy that serves to regulate the processing of personal information received by the Organization.

The Organization may collect personal data from business contacts, partners, personnel, contractors and other individuals (Data Subjects), for reasonable business purposes only if there is consent or deemed consent and the Data Subjects have been notified of such business purposes.

As part of their privileges/ responsibilities, WIMBIZ Associates, volunteers and staff (the “Data Users”) may have the opportunity to collect, access, use and/or process personal data of individuals who interact with WIMBIZ; and/or other databases managed by WIMBIZ (“WIMBIZ Data”).

Examples of personal data can include name, contact details, date of birth and pictures, etc. This data includes, but is not limited to, existing or new data sources and data obtained via websites, application forms, behavioural monitoring, and databases related to WIMBIZ members, non-members, customers, service providers, and various other parties.

The Organization may also collect, use or disclose personal data if it is required or authorized under relevant and applicable laws.

1. Data Protection Officer

A Data Protection Officer will be appointed for WIMBIZ, the officer will handle the following responsibilities:

- a. Monitor and ensure that WIMBIZ processes the personal data of its Data Subjects in compliance with this Policy and other local data protection laws;
- b. Identify and evaluate the Organization’s data processing activities;
- c. Give advice and recommendations to the Organization about the interpretation or application of the data protection rules;
- d. Draw the attention of the Organization to any failure to comply with the applicable data protection rules.

2. Collection of Personal Data

Personal data may be provided in forms filled out by the Data Subjects through face to face meetings, email and other correspondences, WIMBIZ website or provided by third parties.

DATA PROTECTION AND ACCESS POLICY

All such collected data will only be collected, held, processed, used, communicated and/or disclosed in accordance with this policy. The personal data obtained by the Organization may be used for the following;

- a. To provide services;
- b. To serve recruitment purposes;
- c. To respond to the Data Subject's request for the purposes of what such data is provided for;
- d. To maintain contact with partners and other contacts;
- e. To keep partners and other contacts informed of the services offered by WIMBIZ, industry developments, service offerings, seminars and other events hosted by the Organization, that may be of interest to them;
- f. For general management, reporting and accounting purposes;
- g. For such other purposes related to the aims and objectives of WIMBIZ.

The Organization recognizes the right of any Data Subject to unsubscribe from mailing lists, registrations, or decide not to receive further marketing information from WIMBIZ by contacting the Data Protection Officer.

3. Ownership and Responsibility

WIMBIZ Data collected, used and/or managed by WIMBIZ Data Users belong to WIMBIZ.

WIMBIZ shall be responsible for the actions of Data Users with respect to the processing and handling of the Data. Any third party processing of WIMBIZ Data shall be subject to an agreement outlining the third party's responsibility to comply with WIMBIZ Data Protection and Access Policy, including entering into a non-disclosure agreement.

4. Accuracy, Accessibility and Correction of Personal Data

- a. WIMBIZ will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.
- b. The Organization will correct any error or omission in any personal data that is in the Organization's possession or control upon request.
- c. WIMBIZ Data is for access and use only by WIMBIZ Data Users and shall not be furnished to outside entities or be used for any purpose other than for approved purposes.
- d. Access to WIMBIZ Data shall be limited to those WIMBIZ Data Users who need access to perform their responsibilities on behalf of WIMBIZ and/ or in accordance with membership rights.
- e. Data Users hereby acknowledge that compliance with the procedures outline herein helps WIMBIZ maintain proper data security and privacy consistent with industry best practices.

5. Data Access

Data access shall be managed in line with the categories of data (as identified below) and the access levels authorized by the Data Protection Officer.

Data Categories:

- a. **Public Information:** Public information is available to all members of the WIMBIZ community, and may be released to the general public. WIMBIZ reserves the right to control the content and format of Public information. Examples include information on websites, publications and marketing materials
- b. **Internal Information:** Information that is intended for use by and made available to members of the WIMBIZ community who have a need to know. Internal information is not intended for public dissemination but may be released to external parties to the extent there is a legitimate need. WIMBIZ reserves the right to control the content and format of internal information when it is published to external parties.

Examples include employment data, financial expenditure detail and internal reports.

Recognizing that inappropriate disclosure of certain internal information may result in unauthorized use of the data, WIMBIZ reserves the right to designate that certain subsets of internal information require training in the appropriate use and handling of the data.

- c. **Personal/ Confidential Data:** includes personal information such as names, addresses, etc; or other information that is required to be protected by applicable law or statute, or which, if disclosed to the public could expose WIMBIZ to legal or financial obligations.

Access is granted to those individuals who have a need to know and who have signed an appropriate confidentiality agreement.

6. Disclosure of Personal Data to Third Parties

WIMBIZ shall not disclose personal data to third parties except in the following circumstances:

- a. When required by law;
- b. When the Data Subject's consent or deemed consent has been obtained to disclose such personal information;
- c. Where a third party(ies) has been engaged such as data intermediaries or subcontractors, specifically to assist with the Organization's activities. In this case, such third parties will be bound contractually to keep all information confidential;

DATA PROTECTION AND ACCESS POLICY

- d. Where such transfer is made to a successor-in-interest to the Organization's assets.

7. Security And Protection Of Personal Data

- a. The Organization has implemented generally accepted standards of technology and operational security to protect the personal data in its possession or under its control and to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
- b. Only authorized WIMBIZ personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of these information.

8. Withdrawal of Consent

Upon reasonable notice being given by a Data Subject of his/her withdrawal of any consent given or deemed to have been given in respect of the Organization's collection, use or disclosure of Data Subject's personal data.

9. Right to Restriction of Processing

All Data Subjects reserve the right to restrict processing of his/her personal data in defined circumstances and these include:

- a. Where the accuracy of the data is contested;
- b. Where the processing is unlawful; and
- c. Where the data is no longer required save for legal claims of the Data Subject.

10. Objections by the Data Subject

The right of a Data Subject to object to the processing of his data shall always be safeguarded. Accordingly, a Data Subject shall have the option to:

- a. Object to the processing of Personal Data relating to him which the WIMBIZ intend to process for the purpose of marketing;
- b. Be expressly and manifestly offered the mechanism for objection to any form of data processing free of charge.

11. Guidelines for Data Collection, Management and Processing

Data Users, must adhere to the following guidelines in the collection, processing, management or use of WIMBIZ Data.

- a. Data collectors must:
 - i. Provide the Data Subject with a statement of the purpose for which the data is being collected.
 - ii. Provide the Data Subject with an option to agree to the specific terms and conditions associated with the stated purpose.
- b. Data processors/ managers must:

DATA PROTECTION AND ACCESS POLICY

- i. Obtain consent of the Data Subject to agree to receive additional information outside of the purpose stated, including resource materials and events to be organized by WIMBIZ.
 - ii. Ensure that any mass email communication must include the ability for the Data Subject recipient to unsubscribe and not receive further communications as well as provide a link to WIMBIZ Data Protection Policy.
 - iii. Take precautions and ensure that WIMBIZ Data is stored and handled securely and is not accessible to unauthorized individuals.
- c. Data Users must ensure that the WIMBIZ Data is used only in a legal, ethical and responsible manner; and only in accordance with the authorizations received.
- d. Data Users will not:
- i. Disclose WIMBIZ Data to others, except as required by their job responsibilities
 - ii. Use WIMBIZ Data for their own personal gain, nor for the gain or profit of others (save as authorized)
 - iii. Access personal data to satisfy their personal curiosity/ other frivolous purposes
 - iv. Use WIMBIZ Data (in detail or summary) in any publication, seminar or professional presentation; save as authorised
- e. Whenever possible, Data Users shall remove personally identifiable data and use aggregated data prior to processing. If data is to be publicly presented, all personal data must be removed or hidden, unless otherwise expressly consented to.
- f. Data Users must return all WIMBIZ Data to WIMBIZ on the termination of membership, employment or volunteering activities and delete any copy saved on personal devices.

12. Website and Online Privacy

This Policy also applies to any personal data collected via the Organization's websites. Cookies may be used on some pages of the websites. A visitor on the Organization's website is however permitted to decline cookies and still fully navigate the Organization's websites however some functionality in the site may be impaired.

13. Amendment and Modifications

WIMBIZ reserves the right to modify or amend this Policy at any time. To keep its partners and other contacts informed, WIMBIZ will notify changes to this Policy by prominently identifying the alteration for a period of not less than two weeks on its home page at <http://wimbiz.org/>

POLICY VIOLATION

Any Data User who acts in violation of this policy shall be subject to appropriate disciplinary action, including withdrawal of access, dismissal or prosecution under applicable law.