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# INTRODUCTION

The Universal Declaration of Human Rights establishes the fundamental human rights that must be protected worldwide; among them, it is recognized that “no one shall be subjected to arbitrary interference with his privacy, family, home, or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.”

On the other hand, the protection of natural persons in relation to the processing of their personal data is a fundamental right established in Article 8.1 of the Charter of Fundamental Rights of the European Union and Article 16.1 of the Treaty on the Functioning of the European Union.

To carry out our daily work, **ACTION AGAINST HUNGER** needs to collect and use personal information (“personal data”) from donors, beneficiaries, workers, and many other groups of people.

**ACTION AGAINST HUNGER**, within the framework of its commitment to regulatory compliance and to ensure that all staff understand our commitment to information privacy, approves this **GENERAL DATA PROTECTION POLICY**, hereinafter, the Policy, which sets out the rules and principles of conduct that should guide all professionals of **ACTION AGAINST HUNGER**.■



# I OBJECT

This Policy aims to inform the professionals of **ACTION AGAINST HUNGER** about the applicable regulations on data protection and, in particular, **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 (hereinafter, GDPR), the reference standard in privacy matters. In addition to this regulation,

the privacy and data protection regulations of the countries where **ACTION AGAINST HUNGER** operates will apply, if they exist.

The rules of conduct contained in this Policy will apply in the context of the work performed by the professionals of **ACTION AGAINST HUNGER** and are mandatory guidelines for all of them, who must also make their best efforts to ensure that they are respected.



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## PERSONAL DATA



Personal data is any information relating to an identified or identifiable person. That is, information that we can associate with someone specifically, directly or indirectly.

Personal data includes, for example, name and surname, photographs, email address, geolocation data, and what we call “special categories of data,” which are those whose processing may pose a greater risk to the privacy of their holders.

- Ethnic or racial origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning sexual life or sexual orientation.

We must pay special attention and care when collecting and handling these data.■

# I PRINCIPLES



The personal data we handle must respect a series of basic principles. By respecting these principles, we will be sure to comply with data protection regulations and guarantee people's privacy.

## PRINCIPLE OF "LAWFULNESS, FAIRNESS, AND TRANSPARENCY"

Natural persons will be informed that their personal data is being collected, used, consulted, or processed. That is, it must be clearly informed about the use of the data, to whom we can communicate it, the time it will be kept, the legal basis we have, etc., before starting the data processing or on the first occasion we contact the data subject.

## PRINCIPLE OF "PURPOSE LIMITATION"

Personal data must be collected and processed for specific, explicit, and legitimate purposes. We cannot use them for purposes other than those informed to the data subject. If we want to carry out a treatment not initially foreseen, we must inform in advance and, if necessary, obtain the data subject's consent.

## PRINCIPLE OF "DATA MINIMIZATION"

**ACTION AGAINST HUNGER** will only process those personal data that are strictly necessary for the purpose for which they were collected. Data that is unnecessary or excessive cannot be collected.

## PRINCIPLE OF "ACCURACY"

**ACTION AGAINST HUNGER** will ensure that the personal data processed is accurate and up-to-date, adopting reasonable measures to delete or rectify them when detected as inaccurate concerning the purposes for which they were collected.

## PRINCIPLE OF "STORAGE LIMITATION"

**ACTION AGAINST HUNGER** will not keep the personal data it processes beyond the time necessary for the purposes for which they were collected. However, there are exceptions; we may keep them if we have a legal obligation or if they are kept for public interest archiving purposes, scientific or historical research purposes, or statistical purposes. In these latter cases, if possible, we will keep them anonymized (removing references to the data subject's identity).

## PRINCIPLE OF "INTEGRITY AND CONFIDENTIALITY"

**ACTION AGAINST HUNGER** will seek to ensure the integrity and confidentiality of the personal data processed, applying technical or organizational measures to protect them from unauthorized or unlawful processing, against their loss, destruction, or accidental damage.

It is essential that we protect the personal data we collect, receive, share, and store, whether electronic or paper records. ■



# I PROACTIVE RESPONSIBILITY



**ACTION AGAINST HUNGER** is committed to complying with data protection principles; we must also be able to demonstrate such compliance. To do this, we must apply “**proactive responsibility**,” which translates into:

## RISK ASSESSMENT OR ANALYSIS

It involves objectively assessing whether the data processing operations we intend to carry out pose a risk to people’s privacy. If there are risks, controls and measures must be applied to minimize them, and if this is not possible, even evaluate the possibility of not carrying out the processing.

## IMPACT ASSESSMENT

When there is a probability that a particular processing, especially if new technologies are used, entails a high risk to the rights and freedoms of natural persons, a thorough analysis must be carried

out through an Impact Assessment, considering the nature, scope, context, or purposes of the type of processing we intend to implement. The impact assessment will include, in particular, the measures, guarantees, and mechanisms provided to mitigate the risk, ensure the protection of personal data, and demonstrate compliance with applicable legislation.

## RECORD OF PROCESSING ACTIVITIES

**ACTION AGAINST HUNGER** will document the personal data processing it carries out through maintaining a Record of Processing Activities that will include the following information:

- Purposes of the processing.
- Categories of data subjects and personal data.
- Possible data communications to third parties (including international transfers).
- Expected retention periods of the information.
- Applied security measures.



## SECURITY BREACHES

Security breaches or incidents are those technical or organizational anomalies that can cause damage to the rights and freedoms of natural persons who are data subjects. For example: identity theft, error in the distribution of a file, unauthorized access to data, loss of information without the possibility of recovery by backups, etc.

When we encounter such situations that we understand may pose a danger to the privacy of the data subjects or a violation of data protection regulations,

we must inform our superiors as soon as possible to apply the necessary measures to mitigate the possible negative consequences.

A security breach may or may not affect personal data; this is sometimes not easy to identify, but it will be evaluated by the team investigating it.

We should not talk to friends, family, or external contacts of **ACTION AGAINST HUNGER** about data incidents we may come to know; nor should we talk to the media. The team investigating it will be the one to contact them if deemed necessary. ■





## I RIGHTS OF DATA SUBJECTS

Data subjects have a series of rights over the personal data that **ACTION AGAINST HUNGER** is processing:

- Right of access.
- Right of rectification.
- Right of erasure (right to be forgotten).
- Right to restriction of processing.
- Right to data portability.

- Right to object and not be subject to automated individual decisions.

To enforce these rights, the guidelines and rules established in the internal procedures will be followed. Each mission of **ACTION AGAINST HUNGER** has a system to receive requests for the exercise of rights. Contact your reference country's office if you need more information. ■





## I DATA PROCESSORS

**ACTION AGAINST HUNGER** has internal procurement procedures that regulate and establish specific measures to be taken regarding the contracting of service providers who access data as data processors, as well as those providers who, without being data processors, could access personal data under the

responsibility of **ACTION AGAINST HUNGER** accidentally or incidentally. The provision of these services will be regulated in the corresponding data processing contracts or by including ad hoc clauses in the main service contract. ■





# I INTERNATIONAL DATA TRANSFERS

**ACTION AGAINST HUNGER** has a significant international presence, so it will often be necessary to carry out international data transfers even to States that do not offer the same security as the Member States of the European Union or those recognized by the Commission as safe destinations. Therefore,

**ACTION AGAINST HUNGER** will ensure that any processing involving a data transfer outside the Union or to countries that do not have an adequate level of data protection is carried out in compliance with the requirements established in the applicable legislation. ■





