



Data Protection Policy

Global Give Back Circle (GGBC)

1. Introduction

Global Give Back Circle (GGBC) is committed to safeguarding the privacy and security of personal data. This Data Protection Policy outlines the principles and procedures GGBC follows to ensure the protection of personal data collected, processed, and stored in the course of our activities. This policy applies to all employees, volunteers, contractors, and partners who handle personal data on behalf of GGBC.

2. Scope

This policy covers all personal data, whether in electronic or paper form, relating to individuals including employees, volunteers, donors, beneficiaries, and other stakeholders. Personal data refers to any information that can identify an individual, either directly or indirectly.

3. Data Protection Principles

GGBC adheres to the following data protection principles in accordance with applicable laws and regulations:

a. Lawfulness, Fairness, and Transparency

Personal data shall be processed lawfully, fairly, and in a transparent manner. GGBC will inform individuals about the purposes of data processing and ensure that data is handled in a manner consistent with these purposes.

b. Purpose Limitation

Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

c. Data Minimization

Personal data collected shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

d. Accuracy

Personal data shall be accurate and, where necessary, kept up to date. GGBC will take reasonable steps to ensure that inaccurate data is corrected or deleted promptly.



e. Storage Limitation

Personal data shall be kept in a form that permits identification of individuals for no longer than is necessary for the purposes for which the data is processed.

f. Integrity and Confidentiality

Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

4. Legal Basis for Processing

GGBC will only process personal data where there is a lawful basis for doing so. This may include, but is not limited to:

- The individual's consent
- Data required for program participation
- The necessity of the data processing for the performance of a contract
- Compliance with a legal obligation
- Protection of vital interests of the individual or another person
- The pursuit of GGBC's legitimate interests, provided these do not override the individual's rights and freedoms

5. Individual Rights

Individuals whose personal data is processed by GGBC have the following rights:

- **Right to Access:** Individuals can request access to their personal data and obtain information about how it is being processed.
- **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete personal data.
- **Right to Erasure:** Individuals can request the deletion of their personal data, subject to certain conditions.
- **Right to Restriction of Processing:** Individuals can request the restriction of processing under certain circumstances.
- **Right to Data Portability:** Individuals can request to receive their personal data in a structured, commonly used, and machine-readable format and have the right to transmit this data to another controller.
- **Right to Object:** Individuals can object to the processing of their personal data in certain circumstances, including for direct marketing purposes.
- **Rights Related to Automated Decision-Making:** GGBC does not engage in automated decision-making without human intervention that significantly affects individuals.



6. Data Security

GGBC implements appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, or destruction. These measures include, but are not limited to:

- Access controls and authentication measures
- Regular security audits and risk assessments
- Secure storage and disposal of physical and electronic records

7. Data Breach Notification

In the event of a data breach, GGBC will promptly assess the situation and take appropriate action to mitigate the impact. If the breach is likely to result in a high risk to the rights and freedoms of individuals, GGBC will notify the affected individuals and relevant authorities as required by law.

8. Third-Party Processors

GGBC may engage third-party service providers to process personal data on its behalf. GGBC will ensure that such processors provide sufficient guarantees to implement appropriate technical and organizational measures and will enter into data processing agreements with them to safeguard personal data.

9. Policy Review and Updates

This Data Protection Policy will be reviewed and updated regularly to ensure compliance with applicable laws and reflect any changes in GGBC's practices. Employees and stakeholders will be informed of any significant changes to this policy.

10. Compliance and Disciplinary Actions

All GGBC employees and associates are expected to comply with this policy. Non-compliance may result in disciplinary actions, up to and including termination of employment or contract.