

CBSS Internal Routines for GDPR

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Introduction

This document on the CBSS Secretariat's **General Data Protection Regulation (GDPR)** routines describes the procedures for the CBSS Secretariat activities that require collection and processing of personal data from external sources.

This relates to activities such as events, document handling and external communication. These procedures do not cover the CBSS website and its use. This domain is regulated in the CBSS Privacy Policy which is addressed directly to external users on the website: <https://cbss.org/privacy-policy/>.

This document addresses all staff members, it is expected of them to familiarise themselves with and follow the given routines. This is necessary in order to comply with the CBSS Secretariat's obligation of privacy and security work, and to reassure individuals interacting with CBSS that their data is dealt with in an adequate and responsible manner, in accordance with GDPR.

GDPR Background

The GDPR is a privacy and security law that imposes obligations onto organisations that target and collect personal data related to people in the EU. The GDPR will levy harsh fines against those who violate its privacy and security standards (penalties for non-compliance are up to 20 million euros or 4 % of the overall turnover of the organisation or company concerned).

The following definitions are given on the EU website (<https://gdpr.eu/what-is-gdpr/>) dedicated to informing about the GDPR:

- ***“Personal data*** – *Personal data is any information that relates to an individual who can be directly or indirectly identified. Names and email addresses are obviously personal data. Location information, ethnicity, gender, biometric data, religious beliefs, web cookies, and political opinions can also be personal data. Pseudonymous data can also fall under the definition if it is relatively easy to ID someone from it.*
- ***Data processing*** – *Any action performed on data, whether automated or manual. The examples cited in the text include collecting, recording, organizing, structuring, storing, using, erasing... so basically anything.”*

GDPR at the CBSS Secretariat

When the CBSS Secretariat collects data from EU citizen attendees, it is required to obtain their expressed and free consent in order to collect and use their data. Organisations are mandated to create routines that ensure the individual's rights in accordance with the GDPR, for the CBSS Secretariat, such personal data might include:

- Name (first, middle, last)
- Contact information: Address, telephone and e-mail address
- Date and place of birth
- Nationality
- Gender
- CV
- ID and Passport numbers
- Visa
- Bank information
- Travel insurance certificate
- Photos, Videos

When the CBSS Secretariat collects personal data, it is related to activities such as events, document handling and external communication. The CBSS Secretariat seeks to collect the bare minimum information needed for the stated purposes, these may include:

- Receiving and delivering services
- Informing stakeholders of the CBSS Secretariat's work
- Collaborating with partners and stakeholders
- Being able to deliver events and communication activities at best quality
- Reporting on and giving proof of activities

This document will provide the staff of the CBSS Secretariat with GDPR-related routines and seeks to:

- Give an explanation to the purpose of collecting private data for the precise activity.
- Give an overview of what kind of information is collected
- State where information is stored, who can access it and for how long
- State who the information is shared with and why
- Explain which consent options people are presented with (if applicable)

Events

For the purpose of these routines, events are to be interpreted as meetings, seminars and conferences organised within the framework of cooperation and activities of the CBSS, Units, Expert Groups, Projects and the Secretariat.

Photos and Videos

How the CBSS Secretariat handles photos and videos of participants

Purpose

The CBSS Secretariat documents its activities in various ways, via photography and/or videos of events, meetings, official visits to the office etc. Videos and a selection of photos may later be uploaded to the CBSS Flickr account and/or social media channels and website.

Handling

The main contacts when it regards to events and publication of photos and videos is the Media and Communications Unit. In order to follow the GDPR procedure, it is always necessary to inform the Media and Communications unit of all events where CBSS is handling personal data – and in this case photos and videos.

Sharing

The documentation of the CBSS Secretariat's work is an important part of its outreach activities and engagement with external stakeholders as well as the general public. The CBSS Secretariat, as an intergovernmental and public organisation, also documents its meetings and activities with the purpose of being as transparent as possible.

Consent

Information that events are being documented in form photographs and videos will always be communicated to participants during the organisation of the event mainly during the registration process.

The CBSS Secretariat anticipates that participants not willing to be exposed in photos/videos would notify the photographer of their wish before the event or meeting starts. The CBSS Secretariat respects such requests, and photo/video materials in which the specific participant appears in are

subsequently deleted, and not used for any promotional or documentary purpose.

If the CBSS Secretariat has uploaded photo or video material of a participant, to any platform, with which the participant is not comfortable, the CBSS Secretariat will immediately remove the identified photo/video sequence when requested by the participant. The CBSS Secretariat will not remove photos/video sequences where the participant does not appear.

Registration to Events

How the CBSS Secretariat handles event registration information

The Secretariat uses different platforms for registration to events. The responsibility of following GDPR regulations remains with the CBSS and with the assigned responsible official/officer coordinating the event. The Media and Communications Unit as well as the Administrative Unit shall be consulted when dealing with data collection for events.

Purpose

Participants attending events are expected to register themselves. GDPR consent is required when participants sign up for CBSS Secretariat events through an online registration form, such as Google forms or any other registration tool the Secretariat may use, these platforms are a Data Processor.

The CBSS Secretariat collects data important for the execution of that event. Such data may include among other: name, work title and affiliation, email address, telephone number and nationality/citizenship. Such information is used only for the purposes specifically indicated in the form, if there are additional purposes that go beyond that is specified for example subscription to a newsletter associated with event shall be done with express consent by the participant.

Collected information

The information that the CBSS Secretariat collects of its event/meeting participants is in order to be able to:

1. Identify which organisations and representatives are taking part in the event's/meeting's activities.

2. Email and phone details are collected for networking purposes with other participants of the event/meeting, as well as, to facilitate visa application if requested.
3. Track regional representation important to our organisation.
4. Information on dietary restrictions is only collected for the purpose of ensuring that all participants will be served suitable food.

Sharing

If the CBSS Secretariat is organising an event open to the public, the CBSS Secretariat will in some cases share the registration information with third parties. A list of participants, for example, is not shared outside the circle of these very participants. For financial audit purposes the collected information may be shared with an EU auditor in a strict and secure fashion. Handling of collected personal data will be informed to the participants of the event in the registration process.

Limitation

The CBSS Secretariat does not keep registration lists for longer than necessary for the execution of the event or in keeping with the rules of any funding institutions if the event was part of a sponsored project. After that, the registration information is safely disposed of. In case of Google Forms, the survey results are removed.

Recording of Events

How CBSS handles in-person and online events

Purpose

The purpose to record in-person or online events is to document the outcome of the event. Recording is used to produce minutes, reports and PMs that can be circulated and archived. Another purpose may be to provide access to those participants who were not able to attend the meeting, for their own/the funding mechanism's documentation purposes/rules, or for the possibility to share the event with a wider audience to gain visibility for the organisation/project.

Consent

The Secretariat will notify the participants of the recording, if possible, via email before the event or in the event sign up form, otherwise at the

beginning of the meeting. Those who do not wish to be seen/heard in the recording are expected to inform the Secretariat about their wish.

Those that do not wish to appear in recordings of online events, even though they are not speaking, are asked to keep their cameras turned off, and, if possible, attend the meeting using only the name of the organisation they are representing.

If the CBSS Secretariat has uploaded a video of a participant, to any platform, with which the participant is not comfortable, the CBSS Secretariat will immediately remove the identified video sequence when asked to do so by the participant. The CBSS Secretariat will not remove video sequences where the participant does not appear.

Sharing

Recordings of events and meetings may be shared with the project participants, either by providing a link to the file in an email that is circulated among the participants, a non-public link to the video hosted on a video sharing platform that only those with the link can access, or a link to a password protected video that only the participants have access to. Recordings of closed events will never be shared with the general public. Recordings of open meetings and events are accessible to the public and may be uploaded to the Secretariat's Youtube channel, and further distributed via CBSS social media and website(s).

Limitation

Once videos have been shared with the project participants, or uploaded to the CBSS Youtube channel, the videos will be accessible indefinitely, unless otherwise specified, for the intended audiences.

CBSS Committee of Senior Officials (CSO) meetings and Expert Groups

Purpose

The Committee of Senior Officials and the annual Presidency of the CBSS convene a number of times during the Presidency year. According to the Terms of Reference, the CBSS Presidency prepares the agenda for the CSO meetings. Members and the Secretariat may present their proposals for the agenda to the Chair. The CSO holds meetings, as needed, to discuss and to

decide on issues pertaining to cooperation within the CBSS framework. One of the tasks of the Secretariat is to prepare minutes from each of the CSO meetings, aiming to have a complete and concise transcription of the minutes, the meetings are recorded. Similarly, the Expert Groups are getting together in meetings under the CBSS framework.

Consent

The request for approval to record each CSO or Expert Group meeting is put forward by the Secretariat to the Chair and participants of each meeting. The Chair mandates the Secretariat to proceed in recording the meeting after oral agreement and decision.

Handling

In the case of the CSO, the recording is carried out by the Core Team intern under the supervision of the Deputy Director General (DDG). The recordings are made within the conferencing tool, with the CBSS tape recorder and/or CBSS mobile phone. The recordings are kept for 1-2 months after the meeting and deleted after the minutes have been produced, approved and circulated. The Core Team Intern under the supervision of the DDG is responsible to delete the recording.

Expert Groups may choose themselves the exact procedure or recording device, however they handle the recording under the same regulations.

Sharing

The recording from the CSO Meeting is handled by the Secretariat and the office of the DG/DDG. Recordings are not published and are accessible to those who are preparing the minutes for the meeting only.

The minutes from the CSO Meeting are circulated to the CSO Members via the Extranet Platform which creates an automatic e-mail connected to the distribution list of CSO Members and the CBSS Secretariat.

Document handling for registration and visa facilitation

Procedures for secure transfer and handling personal data

Purpose

Personal data related to events (e.g. passports, visa and bookings) are necessary when organising certain meetings, seminars and conferences.

Personal data is therefore collected for organisational and participation/facilitation purposes.

Procedure

Data is collected through the CBSS visa facilitation form or visa facilitation option in the registration. The main method of transferring personal data is through sharing folders or upload to a defined platform. In exceptional cases documents may be transferred through e-mails, however only password secured files may be transferred. GDPR must be adhered to at all times. These procedures for the transfer of sensitive related documents should apply for both sending and receiving the information.

Handling

The personal data provided will be handled by CBSS Secretariat officials and in some specific cases shared with third parties (co-organisers, funding institutions). Within the CBSS Secretariat, officials handling personal data might include Administrative and Communications personnel, Senior Advisers, Advisers and Officers being responsible for related activities.

The CBSS Secretariat will handle personal data only for as long as it is required and will thereafter remove it. This means until the activity has been carried out and finalised.

Subscription

How CBSS handles newsletter and mass emailing services

Purpose

The CBSS Secretariat is currently in charge of creating and disseminating six different newsletters. For the creation and dissemination of the newsletters, online tools like Sendinblue and Mailchimp are used. The CBSS Secretariat uses newsletters and mass emails to disseminate information about recent organisational and project development news, event invitations and report releases. The lists of recipients include ministry representatives, partner organisations, project partners and other interested and affiliated contacts. The information collected for the subscription includes name(s), email address and work and title of the subscriber. This information is stored safely within the mailing platform and is only accessible to authorised persons. The CBSS Secretariat would under no circumstances share its lists of contacts with other organisations or interested parties.

Consent

The CBSS Secretariat never adds external contacts to the lists without their permission (“opt-in” required). Project partners, staff members and contacts that are closely linked to the CBSS, actively participating in and contributing to its work and expecting to be involved in those specific areas, may be added to the list of contacts without prior request, so as not to risk missing announcements important for their own work. Examples of such announcements could be moving announcements or other organisational changes.

Subscribing to a CBSS newsletter is never mandatory, and at the bottom of every newsletter the recipient is always given the option to unsubscribe. The information of unsubscribed contacts is safely archived, but not entirely removed and still accessible to authorised persons. If a contact asks the CBSS Secretariat to manually remove their information from a list(s), the CBSS Secretariat would respect that wish and remove the contact, but such requests need to come from the individual him/herself and cannot be done on behalf of others. The lists of contacts are also kept up to date through removal of subscribers that have gone inactive due to change of job, retirement or similar.

The option to subscribe to the CBSS newsletters is given via CBSS websites, and occasionally circulated in the CBSS social media. The CBSS Secretariat staff members might also ask partners to forward its newsletters to other relevant contacts that are not subscribers and encourage them to sign up.

Appendix

Event Registration Template

This “Event Registration Template” briefly compiles the relevant aspects from the above CBSS Secretariat’s **General Data Protection Regulation (GDPR)** routines. It can serve as a guide for those who organise CBSS projects and activities.

This template does not provide format as much as it allows users to pick the potentially applicable categories and formulations needed in the chosen registration form.

The template will be kept up to date with the latest practices.

Components:

(last updated on 2021-05-12)

- **Title of event**

- **Purpose**
Brief explanation of event and purpose.

- **Details**
Name
E-mail
Affiliation
...

- **[OPTIONAL] Visa Application**
To help facilitate attending an event CBSS Administration will support with the visa application process where applicable. The following information is needed:

Passport number
...

- **[OPTIONAL] Consent/ Information**
 1. I hereby give my consent to the processing of the personal data that I have provided for the purpose of this event. I am aware that the

information provided will be available to the organisers and financiers in accordance with the EU Data Protection Regulation GDPR (2018).

2. By registering for this meeting I agree that the CBSS can share information about me, including name and email address with third parties for networking purposes.
3. The CBSS Secretariat collects and uses the data to manage your registration only. Data will be deleted after the conclusion of the event or after the requested storing duration.
4. I consent to the use of my data as entered in the registration form in accordance with the CBSS Privacy Policy (<https://cbss.org/privacy-policy/>).

- **[OPTIONAL] Photos**

1. During the event photos might be taken for dissemination purposes.
2. I understand that photos or videos might be taken during the event and I hereby consent to material being used that might depict me.

- **[OPTIONAL] Recordings**

The event will/ might be recorded for note-taking or dissemination purposes.

- **[OPTIONAL]** For additional details on the processing of personal data and compliance to GDPR please refer to the CBSS Privacy Policy (<https://cbss.org/privacy-policy/>).