

The Snowflake Trust

Data Protection Policy

Introduction

The Snowflake Trust is committed to treating the information of *Guests, Volunteers, Staff* and other parties with utmost care and confidentiality. This policy should be read in conjunction with the Trust's Confidentiality Policy.

With this policy we ensure that the Trust behaves in a fair and moral manner concerning the gathering, storing and handling of data. This process will be carried out with transparency and respect towards the rights of individuals who entrust it with their information.

Scope

This policy applies to all parties (including *Guests, Volunteers & Staff*) who provide information to the Trust. Generally, it refers to anyone who is in close collaboration with the Trust or acts on its behalf and may need occasional access to the data.

Policy Elements

The Trust needs to collect information about its *Guests and Volunteers*, including names, addresses and telephone numbers.

The Trust commits to collecting this information in a transparent way and only with the full cooperation and knowledge of the interested party. Once this information is available, the following rules are mandatory:

- The data will be collected fairly and for lawful purposes only
- The data will be processed by the Trust within its legal and moral boundaries
- The data will not be stored for more than the specified amount of time
- The data will be accurate and kept up to date
- The data will not be distributed to any other party, except where disclosure is required by any law enforcement agency
- The data will not be transferred to organisations, states or countries that do not have adequate data protection policies

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- The data will not be communicated informally
- The data will be protected against any unauthorised or illegal access by internal or external agencies.

In addition to the ways of handling the data, the Trust has direct obligations towards the people to whom the data belongs. Specifically, the Trust must:

- Let people know which of their data is collected
- Inform people about how their data will be processed
- Inform people about who has access to their information
- Allow people to amend data held in the Trust's databases
- Have provisions in cases of lost, corrupted or compromised data.

Actions

To exercise data protection, the Trust is committed to:

- Develop transparent data collection procedures
- Establish data protection practices with its webmaster
- Develop, with the webmaster, security against cyber attacks
- Inform individuals of the amount of time their data will be preserved
- Publish its data protection policy on the website and at each shelter with all other policies
- Train relevant personnel in online privacy and security measures
- Restrict and monitor access to sensitive information
- Establish clear procedures for reporting breach of security or data misuse.

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

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