



## **Data Protection Policy**

Zonta Foundation for Women, as a nonprofit organization, must follow legal and compliance requirements to protect individual personal data, including requirements specified by the General Data Protection Regulation (GDPR).

### **General Data Protection Regulation (GDPR)**

The General Data Protection Regulation provides data protection regulations for all sectors and organizations regarding the type of data they hold on individuals in the European Union (EU). Individuals have the right to be informed about the collection and use of their personal data, and the right to ask for cancellation of some or all their data any time. GDPR also requires organizations holding data of individuals to establish a data protection policy, available for consultation, and designate someone responsible for ensuring GDPR compliance across the organization. These are key transparency requirements under the GDPR.

### **Purpose**

The purpose of this policy is to:

- Confirm Zonta Foundation for Women's intention to follow the requirements of GDPR.
- Confirm what data we hold, where it came from and who we share it with.
- Identify the lawful bases for processing donor data.
- Set out the process of asking for, recording and managing ongoing consent to store and use the personal data.
- Ensure that all levels of Zonta Foundation for Women have the knowledge and procedures for a correct implementation of the GDPR .

### **Privacy Information**

The personal data held by the Zonta Foundation for Women is used as follows:

- Managing donors and donor contributions records for the Zonta Foundation for Women.
- Supporting the donor recognition program of the Zonta Foundation for Women including publication of donor names in the annual report, website, foundation newsletters and public events.
- Communicating with foundation ambassadors, Zonta members, prospective members, prospective donors and other third-party supporters.

- Inviting donors to foundation activities at conventions, district conferences and other major events.

Detailed information about the data held and the types of use of the personal data can be found in the *Zonta Data Protection Guidelines* on the international website: [https://www.zonta.org/Web/My\\_Zonta/Governance/Policies\\_Guidelines](https://www.zonta.org/Web/My_Zonta/Governance/Policies_Guidelines).

Zonta International headquarters holds the lead personal data storage for the organizations. Clubs<sup>1</sup>, areas and districts may rely on the consent given by members of Zonta International when communicating with Zonta members but shall have to seek additional consent for direct communications with European individuals outside of Zonta membership.

We may disclose personal information that we collect, or you provide as described in this policy to contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

### **Data Protection Officer**

Zonta Foundation for Women data protection officer who oversees the compliance of Zonta International with GDPR is the executive director.

### **Lawful Bases for Processing**

The lawful bases for Zonta Foundation for Women to process data are one or more of the following:

**Consent.** The individual has given clear consent for Zonta Foundation for Women to process their personal data for Zonta-specific purposes.

**Contract.** The processing is necessary for a contract or agreement you have with the individual, or because they have asked you to take specific steps before entering a contract.

**Legal obligation.** The processing is necessary for Zonta Foundation for Women to comply with the law obligations.

**Legitimate interests:** The processing is necessary for Zonta's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

### **Consent**

To enable donors of Zonta Foundation for Women to receive information about the activities of the organization through emails, SMS text messaging and other chatlines, social media or mail, donors are required to give their explicit consent for Zonta Foundation for Women to store their personal data and to use it for purposes related to the membership of the

---

<sup>1</sup> References to Zonta club(s) or club(s) include e-clubs.

organization.

This consent must be given in writing when becoming a donor or a member a Zonta club. The information must be forwarded to headquarters by the club treasurer in connection with the membership application or first donation.

### **Withdrawal of consent**

Withdrawing the consent for Zonta Foundation for Women to store and use personal information is possible, but donor history would then not be available, confirmation of donations made, including receipt of pins, would be impossible and there would be no entry in the *Zonta International and Zonta Foundation for Women Annual Report*, nor an invitation to the donor reception at the biennial convention.

Such action would also exclude the donor from all information about Zonta and Zonta activities. Zonta Foundation for Women would also be obliged to inform the relevant Zonta community such as foundation ambassadors, that the donor data is no longer available to store, use or share.

### **Access to Data**

Every donor to Zonta Foundation for Women has access to their donation history through the Zonta International website. The donor has access to her/his own base data through the Zonta International website. Base data is:

- Name.
- Address.
- Email.
- Telephone number.
- Online giving history.

Additional information can be requested by the donor at [memberrecords@zonta.org](mailto:memberrecords@zonta.org), and will be provided within four weeks of the request made.

### **Retention**

Zonta Foundation for Women will store the personal data of donors according to statutory requirements.

Zonta International Headquarters has Guidelines for the Retention of Documents and Artifacts as part of their Finance Manual. These guidelines cover the statutory or voluntary period for the office to keep all information, documentation and artefacts of Zonta International and Zonta Foundation for Women, and who is responsible for each type of information.

- ▶ *Data Protection Policy*, under Governance/Policies & Guidelines
- ▶ *Privacy Policy*, under Governance/Policies & Guidelines

- *Data Protection Policy Form (Club Use Only)*
- *Retention of Documents and Artifacts Guidelines- Appendix E - Finance and Audit Manual*

**Document control:**

Original Document	Date: February 2017
First adopted by the foundation board	Date: February 2017
Most recent review by the foundation risk manager	Date: February 2022
Amended policy adopted by the board, posted on website	Date: February 2022
Convention 2022 update	Date: June 2022
Next review date	Date: February 2027

Committee Responsible	Risk Manager/ Foundation Board
-----------------------	--------------------------------

*Printed hard copies of controlled documents are considered uncontrolled. All personnel using hard copies for ease of reference are required to determine the up-to-date status of any hard copy document ensuring it matches the current electronic version.*