

Data Protection Policy

Zonta International, 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

The GDPR provides data protection regulations for all sectors and organizations regarding the type of data they keep 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 that Zonta International will 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 member data.
- Set out the process of asking for, recording and managing ongoing consent to storeand use the personal data.
- Ensure that all levels of Zonta International have the knowledge and procedures for acorrect implementation of the GDPR.

Privacy Information

The personal data held by Zonta International on members, prospective members, donors and third-party supporters is used to inform about Zonta activities of general interest or specific information directed to members, clubs¹, areas and districts of Zonta International.

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.

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

1

www.zonta.org

¹ References to Zonta club(s) or club(s) include e-clubs.

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

Lawful Bases for Processing

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

Consent. The individual has given clear consent for Zonta International 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 into a contract.

Legal obligation. The processing is necessary for Zonta International 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 individual members of Zonta International to receive information about the activities of the organization through emails, SMS text messaging and other chatlines social media or mail, members are required to give their explicit consent for Zonta International to store their personal data and to use it for purposes related to the membership of the organization.

This consent must be given when becoming a member of a Zonta club to the club officer in charge of membership, in writing. The information must be forwarded to headquarters in connection with the membership application.

Withdrawal of consent

Withdrawing the consent for Zonta International to store and use personal information, is possible but would present almost impossible barriers for membership, since clubs, areas, districts and Zonta International would be unable to communicate with the member.

Such action would exclude the member from all information about Zonta and Zonta activities. Zonta International would also be obliged to inform the Zonta community that the member data is no longer available to store, use or share, to avoid that a club, area or district violates the member's request.

Access to Data

Every club member of Zonta International has access to their own and other member base data through the website and members are encouraged to update the information when required. Official data is:

2

www.zonta.org

- Name.
- Address.
- Email.
- Telephone numbers (home, office, cell phone).
- · Membership classification.
- Membership number.
- Joining date.
- · Club name and number.
- Area.
- District.

Additional information can be requested by the member from the Membership Department at memberrecords@zonta.org, and will be provided within 4 weeks of the request made.

Members have an option to request to be excluded from the online member *Directory*, on the member profile page.

Every member has access to base data of other members through the *Directory* of the website.

Retention

Zonta International will store the personal data as long as the individual remains a member of the organization. If the member leaves the organization, the data will be erased from all data bases within three years of the individual leaving the organization, and governors and club presidents will be informed, if applicable.

Zonta International Headquarters has Guidelines for the Retention of Documents and Artifacts as part of their Finance Manual (Appendix E). These guidelines cover the statutory or voluntary period for the office to keep all information, documentation and artefacts of Zonta International, 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

3

www.zonta.org

Document control:

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

Committee Responsible	Risk Manager/Zonta International 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.