



## Data Protection Policy

[My Choices Foundation (Her Choices Trust)]

Last updated	April 2021
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### Definitions

Term	Meaning
<b>Data Protection Policy</b>	Policy referring to the collection of personal data and its usage and storage.
<b>Responsible Person</b>	[Sudha Upadhyayula]
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by My Choices Foundation (Her Choices Trust).

### 1. Data protection principles

My Choices Foundation (Her Choices Trust) is committed to processing data in accordance with the best data protection guidelines.

The personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;



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- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the laws of the land in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 2. General provisions

- a. This policy applies to all personal data processed by My Choices Foundation (Her Choices Trust).
- b. The Responsible Person shall take responsibility for My Choices Foundation (Her Choices Trust)'s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, My Choices Foundation (Her Choices Trust) shall maintain an Asset Tracker.
- b. The Asset Tracker shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to My Choices Foundation (Her Choices Trust) shall be dealt with in a timely manner.

## 4. Lawful purposes





- a. My Choices Foundation (Her Choices Trust) shall maintain data in the Asset Tracker for hardware tracking.
- b. Role-based access to the data will be the protocol that will always be followed by My Choices Foundation.
- c. Steps will be taken to only provide role-based access to any user data that has been gathered through website, donations, and newsletter letter subscriptions, amongst others. Data will not be shared with any third-party agencies.
- d. Individuals are given the option to unsubscribe from the mailers.

## 5. Data minimisation

- a. My Choices Foundation (Her Choices Trust) shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 6. Accuracy

- a. My Choices Foundation (Her Choices Trust) shall take reasonable steps to ensure personal data is accurate.
- b. Steps shall be put in place to ensure that personal data is kept up to date.

## 7. Archiving / removal

- a. To ensure that personal data is kept no longer than necessary, My Choices Foundation (Her Choices Trust) shall review the personal data annually and make necessary changes to keep it relevant and archive data that is no longer in use.
- b. Any data that is no longer relevant or in use will be retained for seven years before deletion.

## 8. Security

- a. My Choices Foundation (Her Choices Trust) shall ensure that personal data is stored securely using modern software that is kept-up-to-date.





- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this will be done safely such that the data is irrecoverable.
- d. Appropriate backup solutions shall be in place.

### **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, My Choices Foundation (Her Choices Trust) shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the appropriate legal authority in the country.

END OF POLICY

