



## Data Protection Policy Med'EqualiTeam

### Introduction: personal data, data processing and protection

Personal data is any information that relates to an individual who can be identified from that information.

Data processing represents any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

Data protection refers to laws and regulations that make it illegal to store or share some types of information about people without their knowledge or permission.

**MET** means [Med'EqualiTeam].

**GDPR** means the [General Data Protection Regulation].

**DPO** means [Data Protection Officer].

**HR** means [Human Resources]

### MET's commitment and purpose

The Data Protection Policy sets out MET's procedures and principles in dealing with personal data, individual rights and the organization's responsibilities regarding data protection. Particular care will be given to sensitive personal data related to the beneficiaries MET is working with (individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data) and to criminal record processing for HR-related purposes. Transparency and strict control are adamant for the collection and use of personal data so as to meet data protection rules and obligations.

### Scope of the policy

- All personal data processed by the NGO (medical and non-medical).  
This policy applies to the personal data of job applicants, employees, workers, contractors, volunteers, donors, and former employees, referred to as HR-related personal data as well as beneficiaries of assistance.
- Data collected in France and in the different countries of interventions fall under the scope of this policy.

The DPO is responsible for implementing, updating and the ongoing compliance with this policy and with state and European laws.

This policy shall be reviewed annually.



## I. Data processing: principles

MET is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that 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;
- 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;
- 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 GDPR in order to safeguard the rights and freedoms of individuals; and
- 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.”

MET will

- respect personal data protection principles as soon as the start of the project;
- register all personal data processed in a data processing register;
- prove that all data processing is done within the legal framework;
- notify all violations of personal data to the authorities and the person concerned within 72h;
- mitigate high-risk data collection and processing;
- appoint a Data Protection Officer for all matters related to personal data protection;
- inform beneficiaries, staff, partners and all-associated personnel on the collection, processing, use, storing period of their data, of their rights and appeal pathways;
- allow and support individuals in exercising these rights regarding personal data.

All data processed by MET must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests. The NGO shall note the appropriate lawful basis in the data processing register.

Where consent is relied upon as a lawful basis for processing data, evidence of consent shall be kept with the personal data. The option for the individual to revoke their consent is clearly available and systems are in place to ensure such revocation is reflected accurately in the system.

MET will tell individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing. It will not process personal data of individuals for other reasons.



## II. Transmission of data

The organisation will not transfer HR-related personal data and beneficiaries-related data to countries outside the European Economic Area (EEA).

Should personal data be disclosed to recipients within the EEA, safeguards must apply to such transfers.

## III. Data collection and processing: individuals' rights

- Ask for information on the collection and processing of personal data ;
- Ask whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- Ask for how long his/her personal data is stored (or how that period is decided);
- Ask for and obtain access to own personal data ;
- Rectify incomplete or incorrect personal data;
- Ask to erase data that is no longer necessary for the purposes of processing or if processing is illegal ;
- Oppose/restrict personal data processing for prospection reason or related to one's own particular situation ;
- Ask for a limited personal data processing in particular cases;
- Retrieve personal data in an electronic format for personal usage or to share with another organisation;
- Ask that personal data processing decisions are taken by physical persons and not only computerized. Decisions taken by physical person can also be challenged;
- In case of moral or material damage in relation to a GDPR violation, individuals have the right for legal action.
- Complain to the Data Protection Officer if he/she thinks the organisation has failed to comply with his/her data protection rights;

### *Other rights*

Individuals have a number of other rights in relation to their personal data. They can require the organisation to:

- stop processing or erase data if the individual's interests override the organisation's legitimate grounds for processing data (where the organisation relies on its legitimate interests as a reason for processing data);
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the organisation's legitimate grounds for processing data.

## IV. Violations and sanctions : data security and data breach

### Data security

The security of personal data is taken seriously by MET. Protection measures have been implemented against loss, accidental destruction, misuse or disclosure of personal data. Access to



personal data is protected and limited to personnel/employees in the proper performance of their duties. Unauthorised information sharing is avoided thanks to appropriate security measures.

Personal data are securely stored with adapted technical means, back-up and recovery solutions exist. MET makes sure that personal data are securely deleted to be irrecoverable from original and back-up folders.

Data breach:

MET will notify any violations of personal data by the DPO or any other staff or associated-personnel to the authorities and the person concerned within 72h. All violations whatever the outcome will be recorded.

In case of high security breach, the concerned individual will be informed and information shared with him on the possible consequences and mitigations measures taken.

**V. Responsibilities**

Individuals are responsible for helping the organisation keep their personal data up to date. Individuals should let the organisation know if data provided to the organisation changes.

**VI. Governing laws and regulations**

- The General Data Protection Regulation (GDPR) [Regulation \(EU\) 2016/679](#)
- Medical data conservation

**VII. Associated documents**

- Data processing register