

FONASBA GDPR COMPLIANCE



LONDON, April 2018

COMMUNICATIONS AND OPERATIONAL DATA COLLECTION AND PROCESSING POLICY

BACKGROUND

As a worldwide membership organisation, FONASBA is required to communicate with its members and its officers on a regular basis and by a number of means, primarily email and telephone. Messaging applications such as text, iMessage and WhatsApp are occasionally used but not for formal communication purposes. In order to allow the organisation to operate effectively and communicate with its members, enable members to communicate with each other, allow potential members and interested third parties to contact FONASBA or its members and to promote the organisation, it is necessary for the FONASBA Secretariat to maintain and update relevant and appropriate contact information. Where appropriate, it will publish in the public domain lists of its members (and their primary contacts) and of the FONASBA Officers and committee members. FONASBA also collects and maintains contact data on individuals in other organisations and elsewhere with whom it is necessary to communicate in the course of its normal business operations. In some cases, those contact details may be considered to be personal data.

DATA COLLECTION

The following data is collected in relation to FONASBA members and others as specified:

- Name and contact details of the primary contacts for FONASBA matters within its member organisations*
- Name and contact details of the senior officer of the member association
- Name and contact details of the Officers and committee members of FONASBA and of its European Committee ECASBA*
- Name and contact details of contacts within other organisations with whom it is necessary to communicate in the course of FONASBA's normal business operations
- Name and contact details of other individuals who may elect to receive information on FONASBA and its activities

Data marked * may be published in membership and other lists and made available in the public domain. In this case the information comprises:

For FONASBA member associations:

- The name and address of the association
- The telephone number, email address and website of the association
- The name of the primary contact for the association
- A mobile telephone number, if provided by the association

For FONASBA Officers and committee members:

- The name and position (within FONASBA) of the individual
- Their preferred contact address. This is usually the address of their normal place of business, of their association or any other address they may nominate
- Their telephone and mobile numbers and email address. Where Officers are provided with email addresses on the “@fonasba.com” domain, that address will be shown, otherwise the individual will provide another email address.

FONASBA also publishes on its website details of the companies awarded the FONASBA Quality Standard.

All contact data provided to FONASBA by member associations, Officers, committee members, business contacts and others is on a voluntary basis and is used expressly and exclusively for the purpose of legitimate business communication in connection with FONASBA’s operations. Where contact information is published in the public domain (see above), the data provider is invited to review and where necessary correct same prior to it being published.

DATA PROCESSING

The FONASBA Secretariat regularly reviews its membership data to ensure it is up to date and accurate and reissues lists as soon as practicable to reflect changes in names, contact details, committee membership and similar. Annually in June, FONASBA member associations are requested to review the contact data held and to notify the Secretariat as soon as possible should it have changed. Requests to remove contact data from its records are also actioned as soon as practicable.

In communicating with its members by email, only the addresses of the Executive Committee members are shown in clear, those for all other recipients are in blind copy.

With regard to the FONASBA Quality Standard (see above), the names and contact details of those companies approved to it are provided to FONASBA by the company itself via the association to which they belong. That association is required by the terms of the Quality Standard to audit those companies at least biennially and report any changes to FONASBA.

FONASBA does not sell or knowingly allow its membership records, contact data or similar information to be used for commercial purposes, either by its members or third parties. It is understood by all concerned, however, that data in the public domain may be collected and used by third parties for their own purposes. Such actions are outwith the remit of FONASBA.

DATA RETENTION

Contact data will be retained until FONASBA is notified, or otherwise becomes aware, that it is no longer accurate or relevant to its legitimate business activities or if the data subject elects to withdraw their consent for it to be retained, at which time it will be securely destroyed. In addition, FONASBA carries out an annual review of the data it holds in order to ensure it remains accurate and relevant.

DATA BREACH

Any personal data breach will be investigated and actioned in accordance with FONASBA’s Personal Data Breach policy.

JCW/London, April 2018.