

# FONASBA GDPR COMPLIANCE

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LONDON, April 2018

## DATA COLLECTION AND PROCESSING ASSESSMENT

### BACKGROUND

FONASBA is an international membership organisation operating in the maritime sector and representing ship brokers and ship agents. Its members comprise both national representative organisations (themselves representing companies operating in the ship broking and ship agency sectors) and individual companies operating in countries where no national association exists. FONASBA does not include any individuals in its direct membership.

Amongst its core activities, FONASBA organises meetings, usually in the country of domicile of one of its member associations, which are attended by representatives of its member organisations and also invited guests from the local maritime community. FONASBA works with its member association in the United States to provide education to individuals in the employ of companies in membership of its national associations. It organises an annual competition for young members to write a thesis length paper on a matter of relevance and interest to the membership. FONASBA also hosts events for members and takes and receives photographs and video footage from those events, and others at which FONASBA representatives have participated, for publication on the FONASBA website and its Facebook and LinkedIn pages.

FONASBA is also an employer, currently employing two individuals (one full time and one part-time) at its head office in London.

### GENERAL DATA PROCESSING POLICY PRINCIPLES

In the course of providing a service to its members, FONASBA will communicate regularly with those members for the purposes of providing information and guidance, seeking information on relevant commercial and statutory practices and legal obligations in the areas of interest and concern to its members and for other purposes that are strictly limited to those necessary to operate and administer the organisation. The primary means of communication is by email, using email addresses provided by the members for that specific purpose. Those members also voluntarily provide additional contact information for the named individual within the member designated as being the primary contact for FONASBA purposes. That information is made available in the public domain by means of a listing on the FONASBA website and through a downloadable membership list. Some of the email addresses provided by members are deemed to be personal information under the terms of the GDPR.

Contact data is regularly reviewed to ensure that it remains up to date and necessary for the purposes it was originally collected. When an individual leaves a FONASBA member, they may elect to have their details left on the mailing list for continuing interest purposes. Redundant email addresses are routinely removed from the lists.

FONASBA does not make its email contact lists available outside the membership of the organisation, nor does it knowingly allow its membership data to be used for commercial or marketing purposes.

Personal information collected on event attendees or participants in education programmes is processed strictly for the purposes for which it has been requested and is routinely and safely disposed of once the event or education programme has been completed.

Participants at FONASBA events are notified in advance that they may be photographed or have video footage taken during the event and the images used for publicity purposes by means of being posted to the FONASBA website (FONASBA's FLICKR page is only accessible via the password protected Members' Area) or on its social media pages on Facebook and LinkedIn. FONASBA representatives participating in external events are also invited to provide photographs or video footage of their attendance and in so doing are deemed to have given their consent for them to be used for these purposes.

FONASBA also collects and processes personal information on its employees for the purposes of compliance with employment, taxation and its other statutory obligations as an employer. Historical personal information, for example in relation to statutory employment returns, is only retained in so far as it is required in accordance with current legislation.

Any personal data breach will be investigated immediately FONASBA becomes aware of it and will be actioned in accordance with the relevant policy.

#### SECURE DESTRUCTION OF PERSONAL DATA

Personal data held by FONASBA will be securely destroyed at the end of the retention period stated in the appropriate policy. Electronic data will be deleted from the system by the use of industry standard file deletion software, notably the Complex Overwrite (7 times) and Free Space Wipe facilities provided by the CCleaner utility. Data held on paper will be shredded. FONASBA member associations holding personal data, for example in relation to Annual Meetings or FONASBA events, will be required to destroy the data in a similarly secure manner at the end of the retention period.

The undernoted FONASBA data collection and processing policies are developed and managed in accordance with these principles:

- Communications and Operational Data Policy
- Education Programme Data Policy
- Events and Conferences Data Policy
- Employee Data Policy
- Personal Data Breach Policy

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