

## Data Protection Policy

### 1. Introduction

The Data Protection Act (the Act) covers information about individuals which is held on computer or in a manual filing system, or which is recorded with the intention that it will be part of such systems. The Act applies to people or organisations that use or hold such personal data.

The Act is based on the right of the individual (the Data Subject) to know what information is being held about them, and how the information will be used. The Act sets out principles to ensure that personal data is:

- processed fairly and lawfully
- obtained only for specified purposes
- relevant to the purposes for which it is processed
- accurate and kept up to date
- not kept for longer than is necessary
- processed according to the rights of the Data Subject under the Act
- protected against unauthorised processing, accidental loss or damage
- not transferred to areas outside of the European Union (including via websites)

Fuel Macedonia (the Charity) holds personal information on people associated with the Charity (see 'Who is covered by this policy').

Fuel Macedonia seeks to comply with both the letter and the spirit of the Act.

### 2. Purpose of this policy

The purpose of this policy refers to our commitment to treat information of all people associated with the Charity including associated partners and organisations and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

### 3. Scope

This policy refers to all parties who provide any amount of information to the Charity.

### 4. Who is covered under this Policy?

Trustees, supporters, volunteers and connected-people must follow this policy. Beneficiaries, and any other external entity (associated local partners and partner organisations) are also covered. Generally, this policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

### 5. Policy elements

As part of the Charity's operations, information has to be obtained and processed. This information includes any offline or online data that makes a person identifiable such as names, addresses, phone numbers, usernames and passwords, digital footprints, photographs, financial data etc.

The Charity collects this information in a transparent way and only with the full co-operation and knowledge of interested parties.

Where photographs of trustees, supporters, volunteers, local partners, partner organisations, or beneficiaries are used to publicise or promote the organisation, permission will be sought from individuals and the photograph used for a specified length of time.

Once information is available to us, the following rules apply.

Our data will be:

- accurate and kept up-to-date
- collected fairly and for lawful purposes only
- processed by the Charity within its legal and moral boundaries
- protected against any unauthorised or illegal access by internal or external parties

Our data will **not** be:

- communicated informally
- Stored for more than a specified amount of time
- transferred to organisations, states or countries that do not have adequate data protection policies
- distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the charity has direct obligations towards people to whom the data belongs. Specifically, the Charity must:

- let people know which of their data is collected
- inform people about how the data will be used
- inform people about who has access to their information
- have provisions in cases of lost, corrupted or compromised data
- allow people to request that their data is modified, deleted (except where financial legislation requires its retention), reduce or correct data contained in our databases

## 6. Actions

To exercise data protection the Charity is committed to:

- restricting and monitoring access to sensitive data
- developing transparent data collection procedures
- training trustees and those who might have access to data in online privacy and security measures
- building secure networks to protect online data from cyberattacks
- establishing clear procedures for reporting privacy breaches or data misuse
- including contract clauses or communicating statements on how the Charity handles data
- establishing data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

Our data protection provisions will appear on our website.

## 7. Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.