

## Probbary – Data Protection Policy

The purpose of this document is to relay the essential information on the data protection policy of Probbary to the people in charge of updating or handling the person registers that the organization has.

The organization currently has the following files containing personal information:

- Member register
- Event signups

This document and the privacy statement for the registers listed above must be updated yearly, no later than the 31st of January, as the board and persons in charge change. The person responsible for the update is the person in charge of the register, or if they are missing or absent, the secretary.

### User rights of the data protection registers

Limiting access to the information plays a very important role in preventing data protection problems. Access should be limited only to individuals who have the need to access the information in order to manage the organization's activities. For example, the whole board of the organization should not have access rights at the start of the term; rather, the access should be limited to the person responsible for the register. The person responsible for the register in our organization is always the incumbent secretary unless a separate decision stating otherwise has been made.

Correspondingly, the access rights of the previous members of the board should be removed immediately after the change of the term, unless it is clear that the person in question will need access to the register in their new board position during the new term.

The removal of old access rights should be done no later than on the 31st of January. The person responsible for the update is the person in charge of the register, or if they are missing or absent, the secretary.

## Life cycle of the information

The information in the registers must be kept only for as long as it serves its purpose. The member register must thus naturally have all the member information of the members of the organization, and they must be removed when the person leaves the organization.

When it comes to the event signups, the information should be removed when it is seen that it is not essential or needed for the event for which the information has been gathered. In terms of a normal event, this means about two weeks, after which the possible remaining participation fees etc. have been handled.

Anonymous data can be gathered from people who have attended events, meaning attendance numbers, amounts of omnivores and vegetarians, or other information that is not linked to register data. This information should be kept in a separate register.

## Technical assurances for data protection

The technical execution of the registers is important in addition to access rights. Currently, the registers of the organization are kept on the organization's own Google Drive, where access is restricted through a password and encryption of information.

The event signup register contains information of dietary restrictions of individuals. The wording here is important, because allergy information is considered sensitive private information, whereas dietary restrictions are considered normal personal data. The legislation on data protection concerning sensitive private information is noticeably stricter.

## Right of an individual to check and request for corrections in the information

A private individual has the right to request for the information Probbary has on them. In practice, this means the member register information.

Because we have only very little information on a person in the member register, a quick search of both the member register and separate event signups is not hard to do. The information should be handed over primarily in the same format as the request, meaning that an email should be answered to with an electronic reply with the information. A reasonable amount of time for processing the request is one month.

When required, the requesting party can be asked to verify their identity.

Correspondingly, the individuals have the right to request for a correction in their information. A reasonable amount of time for correction requests is also one month.