

SKZ Department of Policy and Governance

# SKZ Foundation Data Protection Policy

Policy Number - 0003 Approved on - 02 December 2023

#### Section

- 1 Introduction
- 2 Definitions
- 3 Data Protection Principles
- 4 Roles and Responsibilities
- 5 Data Processing Activities
- 6 Lawful Basis for Processing
- 7 Consent Management
- 8 Data Minimization and Purpose Limitation
- 9 Data Accuracy and Integrity
- 10 Data Security and Protection
- 11 International Data Transfer
- 12 Children's Data
- 13 Data Subject Rights
- 14 Review and Update of Data Protection Policy
- 15 Training and Awareness
- 16 Compliance Monitoring and Auditing
- 17 Record Keeping and Documentation

# **1: Introduction**

This policy establishes the framework for data protection at the SKZ Foundation, ensuring compliance with the Data Protection Act 2018 and the GDPR. It addresses the handling of personal data related to our operations in Lahore and Gilgit-Baltistan, particularly focusing on the information of donors, beneficiaries, staff, and volunteers.

# 2: Definitions

**Organization:** SKZ Foundation, a non-profit entity actively engaged in educational and skill development initiatives in Lahore and Gilgit-Baltistan.

**DPA**: Data Protection Act 2018, the UK's legislation for data handling and protection.

**Responsible Person:** Ms. Ansa Asim, who oversees data protection strategies, ensuring compliance and addressing potential data protection issues at SKZ Foundation.

**Personal Data:** Information relating to an identifiable individual, directly or indirectly, including names, identification numbers, location data, or factors specific to physical, physiological, genetic, mental, economic, cultural, or social identity.

Data Subject: Any individual whose personal data is being processed by the SKZ Foundation.

**Data Breach:** A security incident resulting in unauthorized or unlawful access to, destruction, loss, alteration, or disclosure of personal data.

# **3: Data Protection Principles**

**Compliance:** The Foundation commits to handle personal data in accordance with the DPA, GDPR, and other relevant privacy laws.

**Ethical Data Processing:** The foundation ensures that all personal data processing is lawful, fair, and transparent, respecting the rights of individuals.

# 4: Roles and Responsibilities

**Data Protection Officer (DPO):** Ms. Ansa Asim is responsible for monitoring compliance, assessing data protection policies, conducting audits, and providing advice and training to staff.

**Staff Training and Awareness:** Regular training programs for staff to understand data protection responsibilities, GDPR requirements, and best practices.

# **5: Data Processing Activities**

**Cloud Storage (OneDrive):** Utilized for storing and sharing documents, including personal data. Access is restricted to authorized official members.

**Email Marketing (Mailchimp):** Employed for sending updates and fundraising emails with secure management of subscriber data.

**Donation Processing (PayPal, Stripe)**: Used for processing online donations, ensuring compliance with financial data protection standards.

Website Analytics (Google Analytics): Analyzes website traffic and user engagement with aggregate data collection and privacy safeguards.

**Security Software:** Includes antivirus software and firewalls to protect digital assets from cyber threats. Regular updates and monitoring are implemented.

#### 6: Lawful Basis for Processing

**Justification for Data Processing:** The Foundation processes data based on lawful bases such as consent, contractual necessity, and legal obligations. Consent is obtained through clear, affirmative action from the data subjects.

#### 7: Consent Management

**Obtaining and Recording Consent:** Clear mechanisms are in place for obtaining, recording, and managing consent. Individuals provide consent through explicit actions such as ticking opt-in boxes or agreeing to specific terms.

**Withdrawal of Consent:** Individuals have the right to withdraw their consent at any time. The Foundation has procedures for data subjects to easily withdraw consent.

#### 8: Data Minimization and Purpose Limitation

**Relevance of Data Collection:** The Foundation collects only the data necessary for the purposes for which it is processed. Unnecessary data collection is avoided.

**Limitation on Data Use:** Personal data is used solely for the purposes for which it was collected, and the Foundation does not process data in ways incompatible with these purposes.

#### 9: Data Accuracy and Integrity

**Ensuring Data Correctness:** The Foundation implements measures to ensure the accuracy of data collected and maintained.

**Data Update Procedures:** Personal data is periodically reviewed and updated to ensure it remains relevant and accurate.

#### **10: Data Security and Protection**

**Robust Data Security Measures:** The Foundation employs modern, secure technology and methods to protect personal data from unauthorized access, disclosure, alteration, or destruction.

Access Control: Access to personal data is strictly limited to authorized personnel. The Foundation implements robust security protocols to prevent unauthorized data sharing.

### **11: International Data Transfer**

**Transfer Mechanisms and Safeguards:** If data is transferred outside Pakistan and the UK, the Foundation ensures that adequate protection mechanisms are in place, such as Standard Contractual Clauses or verifying adequacy decisions.

# 12: Children's Data

**Special Protection Measures:** If applicable, the Foundation implements extra safeguards for processing children's data (students of SKZ Model School), including age verification and parental consent mechanisms.

# 13: Data Subject Rights

**Mechanisms to Exercise Rights:** The Foundation provides clear and accessible processes for individuals to exercise their rights under GDPR, including data access requests, rectification, and erasure.

# 14: Review and Update of Data Protection Policy

**Regular Review Schedule:** The Foundation regularly reviews and updates its data protection policy to ensure it remains up-to-date with legal requirements and organizational changes.

#### **15: Training and Awareness**

**Ongoing Training Programs:** Regular training for all staff members on GDPR and data protection responsibilities.

Awareness Campaigns: Regular communications to staff and stakeholders about data protection updates and best practices.

# **16: Compliance Monitoring and Auditing**

**Regular Audits:** The Foundation conducts regular audits to ensure compliance with its data protection policy and GDPR.

**Remediation Plans:** Development and implementation of remediation plans for any identified compliance gaps.

#### **17: Record Keeping and Documentation**

**Data Processing Records:** The Foundation keeps detailed records of data processing activities.

**Documentation of Compliance Efforts:** The foundation keeps records of training, audits, policy reviews, and updates.

Regular reviews and updates will be conducted to ensure compliance with evolving legal requirements and organizational changes. Our ongoing efforts in training, awareness, compliance monitoring, and record-keeping are integral to maintaining the highest standards of data protection. The SKZ Foundation reaffirms its dedication to safeguarding personal data, embodying our core values of integrity, accountability, and ethical practice in all aspects of our data management.