



Data Protection Policy

Samos Volunteers

2020 Onwards

I. INTRODUCTION

Founded in 2016 as a group of independent volunteers responding to the humanitarian crisis in Samos, Samos Volunteers operates following the principles of humanity, impartiality, independence and neutrality according to its core values: Do no harm, do it for the many, facilitating community, the little things are the big things and work in progress.

Samos Volunteers are committed to addressing the humanitarian need in Samos, through both hygiene and psycho-social activities, enhancing dignity and showing solidarity to residents of Samos RIC. Samos Volunteers aims to work sustainably with camp and local communities to offer immediate relief, build resilience and develop peoples potential. Samos Volunteers endeavours to do this in a responsible, sensitive, sustainable and inclusive way.

Our approach is guided by our 5 core values:

- **Do No Harm** We are committed to taking a critical approach to our activities to carefully consider our activities in order to minimise harm and maximise the positive impact of our services.
- **Do it for the Many** We are committed to using donor money to reach the maximum number of people in the community. To achieve this we strive for equality of access, meaningful inclusion and representation throughout our organisation.
- **Facilitating Community** We are committed to supporting the camp and local communities on Samos, responding to their needs and interests through listening, learning and adapting. We strive to facilitate the building of relationships between the communities to drive sustainable change.
- **The Little Things are the Big Things** We are committed to taking a thoughtful and reflective approach to the planning, implementation and evaluation of our work, acknowledging the wide ranging impacts that our operations can have for service users. We strive to provide considered and quality service users centred on our belief of humanity and solidarity.
- **A Work in Progress** We acknowledge that working in a dynamic environment requires us to adapt quickly in changing circumstances. We are committed to doing our very best



A Policy Statement

Samos Volunteers is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its operations. To this end our policies:

Develop Awareness

- Encourage Prevention
- Promote Detection
- Set Out a Clear Response to Concerns

This policy is aimed at guiding should be considered in conjunction with Samos Volunteers:

- [SV Policies & Code of Conduct](#)

II. Interpretation and Application

Article 1- Scope of Application

1. The policy applies to all SV Volunteers and governance members.
2. The provisions of this policy may also be applied to any person employed by an entity that carries out missions for Samos Volunteer.
3. In particular, this policy applies to implementing partners depending on specific clauses and conditions of the grant agreement, suppliers, sub-grantees, beneficiaries (as victims), stakeholders, consultants, and other associated entities.

Article 2- Definitions

1. **NGO** means Samos Volunteers, registered NGO in both Greece and Spain, operating in Samos, Greece.
2. **GDPR** means General Data Protection Regulation
3. **Responsible Person** refers to Bogdan Andrei, the organisation's appointed data protection officer.



4. **Register of Systems** means a register of all systems or contexts in which personal data is processed by the Organisation.

III General Principles

Article 3- Data Protection Principles

1. The NGO is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Article 4- General provisions

- a. This policy applies to all personal data processed by the NGO.



- b. The Responsible Person shall take responsibility for the NGOs ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

Article 5 - Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the NGO shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the NGO shall be dealt with in a timely manner.

Article 6 - Lawful purposes

- a. All data processed by the organisation must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see HDPa guidance for more information](#)).
- b. The NGO shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Organisation's systems.

Iv. Mechanisms to Protect Data

Article 7- Data minimisation

- a. The NGO shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. [Add considerations relevant to the Organisation's particular systems]



Article 8- Accuracy

- a. The Organisation shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. [Add considerations relevant to the Organisation's particular systems]

Article 9- Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the NGO shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

Article 10- Security

- a. The NGO shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

Article 11- Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Organisation shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the HDPA website](#)).

V. Implementation of the policy

Article 12- Implementation date of the policy



1. The Child Data Protection Policy comes into effect after approval from the Samos Volunteers board on 25/02/2021

Article 13 - Adherence to the Policy

1. SV Volunteers and the other entities referred to in Article 1 of this policy, certify that they adhere to these principles by signing the Samos Volunteers Volunteer Agreement Form.

End of Policy

