



DATA PROTECTION POLICY

LGBTI+ GOZO

Last updated:	26 June 2020
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1. Introduction and General Provisions

This document outlines the privacy policy for LGBTI+ Gozo (www.lgbtigozo.com) which are in compliance with The Data Protection Act, Chapter 440 of the Laws of Malta, the European Union Directive 2002/58/EC and Regulation (EU) 2016/679 (GDPR).

These policies are subject to change – such changes will be communicated on our website and the policy document will be dated.

Note that we cannot take responsibility of the data protection policies of third-party websites we might link to.

Furthermore:

- This policy applies to all personal data processed by the Association.
- The Responsible Person shall take responsibility for the Association's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.

2. Definitions:

Association	means "LGBTQI+ GOZO", a registered Voluntary Organization in Malta with the registration number VO/1862
Consent	means any permission, consent or preferences that you provide us with
GDPR	means the General Data Protection Regulation
Member	means an individual that has opted to be associated with and be contacted by the Association
Responsible Person	means the President of the Association, currently Eman Borg
Register of System	means a register of all systems or contexts in which personal data is processed by the Association.
Website	means the main site of the Association, http://www.lgbtigozo.com



3. Data Protection Principles

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

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

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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
- f. 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.

4. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Association 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 charity shall be dealt with in a timely manner.



5. Lawful purposes

- a. All data processed by the Association must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Association 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 Association's systems.

6. Data minimization

The Association shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7. Information collected

- a. We collect personal information that you voluntarily provide to us when expressing an interest in becoming a member of the Association.
- b. The personal information that we collect depends on the context of your interactions with us. The personal information we collect can include the following:
 - Publicly Available Personal Information.
 - We collect first name, last name, locality, sex and/or gender, full address, nationality, mobile number, email address, and other similar data.
- d. All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

8. What the information is used for

We use personal information collected via our website for a variety of purposes described below. We process your personal information for these purposes in reliance on our legitimate charitable interests, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.



We use the information we collect or receive:

To send administrative information to you	We may use your personal information to send you relevant, topical information about our Association or its causes and projects
To enable communication	We may use your information in order to enable Association-to-Member communications, with your consent.
To deliver services to our Members	We may use your information to provide you with the requested service.
To respond to Member inquiries/offer support to Members	We may use your information to respond to your inquiries and solve any potential issues you might have
To obey laws and regulations that apply to us	We may use your information to comply with regulations that apply to us.
To run the Association in an efficient and proper way	We may use your information to manage our financial position, business capability, planning, communications, corporate governance, and audit.

9. Sharing of Information

We may process or share data based on the following legal basis:

- Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate charitable goals.
- Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.



Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

10. Collection of data from minors

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the website and related services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at lgbtigozo@gmail.com

11. Accuracy of data

- a. The Association 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.

12. Archiving / removal of data

- a. To ensure that personal data is kept for no longer than necessary, the Association 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.



13. Security

- a. The Association 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 unauthorized 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.

14. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, the Association shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach.

15. Rights of the Member

You have the right to:

- a. obtain confirmation that we are processing your personal data
- b. request a copy of the personal data we hold about you
- c. ask that we update/correct the personal data we hold on you
- d. ask that we delete your personal data,
- e. as that we limit the use of your personal data
- f. revoke your consent to us using/storing your personal data
- g. receive a copy of your personal data
- h. object/raise concern to our using of your personal data.

If you have any other questions, or wish to exercise any of the above rights, please e-mail our Data Protection Officer on lgbtigozo@gmail.com or write to us at the address below:

LGBTI+ Gozo
Flat 1, Block 1A
Triq Patri Anton Debono
Rabat, Gozo, VCT2283
Malta



16. Complaints

If you have any complaints, you have a right to complain to the Office of the Information and Data Protection Commissioner in Malta or the relative data protection authority in your country. More details can be obtained from: <https://idpc.org.mt/en/Pages/contact/complaints.aspx>

17. Cookies

Cookies may be sent/retained when visiting our, or any other, website. These are pieces of data sent from a website and stored in your browser. Every time you load a website, the browser sends the cookie back to the server to notify the website of your previous activity, so it can recognize you and can customize what you see on the screen according to your registered preferences.

Advertisers and independent third parties may also use statistical cookies to track who has seen an advert and clicked on it. You can turn cookies off but if you do so, you may not be able to use all services on our Website and you might see more pop-ups and other advertising. This is because we will not be able to limit what you see by using cookies. However, you will still be able to see our editorial content.

By using this Website you are agreeing to the use of cookies as described.

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