

DATA HANDLING POLICY

Overview

This document defines the Data Protection Policy at the Alumni Association of CCNY and offers guidance on duties and best practice to users.

Definitions

For the purpose of this policy, the following definitions apply:

Personal data: any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier (including name, email address, IP address, identification number, location data etc.).

Sensitive data: any data related to racial or ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation, bank account details, debit or credit card details and any data related to children and minors under the age of 13.

Other data: any data that is not personal data or sensitive data.

General Data Protection Regulation (GDPR): The General Data Protection Regulation 2016/679 is a regulation in EU law on data protection and privacy for all citizens of the European Union and the European Economic Area. It also addresses the export of personal data outside the EU and EEA areas.

Scope of this policy

This policy applies to all forms of data handling at the Alumni Association or on its behalf, manual or automated, in paper, electronic or any other form and to all categories of data without limitation.

Principles of data handling

When handling any data at the Alumni Association of City College of New York, you should always operate within the following principles:

Principle 1: Lawfulness, Fairness and Transparency

All data at the Alumni Association of City College of New York shall be processed lawfully and fairly. Where personal data, including sensitive data, is handled, this shall also be done in a manner transparent to the identified or identifiable person to which the data refers.

There must always exist a legal basis as defined in the General Data Protection Regulation (GDPR) for collecting, storing, and processing of all data. If in doubt, you must consult with the Data Protection Officer at the Alumni Association of City College of New York.

Principle 2: Purpose Limitation and Relevance

Data at the Alumni Association of City College of New York is collected for specified, explicit and legitimate purposes in accordance with the Alumni Association's mission and vision. This data is never processed in a manner that is incompatible with those purposes. This means that when collecting and/or processing data, you should always specify exactly what the data will be used for and limit any handling and processing to only what is necessary to meet the specified purpose.

Where the purpose for processing data is no longer valid or there no longer exists a valid legal basis for it, the data must be securely deleted.

Principle 3: Storage Limitation and Retention

Personal and sensitive data shall be kept for no longer than necessary for the purpose for which the data is collected, stored, and processed. Where possible, data that is retained for historic, statistical, or other relevant purposes should be anonymized as much as possible and held for no longer than 60 days.

Principle 4: Security, Integrity, and Confidentiality

All data at the Alumni Association of City College of New York should be handled, always, in a manner that is secure and that maintains the data's integrity and confidentiality. All necessary precautions must be taken to protect against unauthorized or unlawful processing, and against accidental loss, destruction, or damage and against theft.

Handling sensitive data

You must not, under any circumstances, collect, store, access, or process sensitive data/Personal data unless you have been authorized to do by the Executive Director, the Data Protection Officer, or the IT Director.

Where you download, copy, or otherwise handle data outside of the Alumni Association of City College of New York office, you must take all appropriate measures to ensure this data remains secure and is not shared, exposed, or otherwise compromised in any way. Such data should never be left unsupervised and should never be left behind. Where the data or copy is no longer needed for the purpose for which it was obtained, it must be deleted or disposed of in a secure manner.

Sending data to third parties

Sharing data with third parties is restricted unless with the explicit approval of either the IT Director, the Data Protection Officer, or the Executive Director.

Wherever data is transmitted to third parties, this must always be done using an approved method. Unless not possible for good reason, data should be communicated by direct file upload or other appropriate form of electronic transmission.

Removable media (including USB sticks, external hard drives, CD, DVD, etc.) must not be used for transmitting data to third parties or anyone, unless approved by the IT Director, the Data Protection Officer, or the Executive Director.

Notification of a Breach

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority at the Alumni Association of City College of New York.

