

# Caritas Sri Lanka – **SEDEC**

## DATA PROTECTION POLICY



Approved by Board of Directors on 12<sup>th</sup> March 2019



# **Data Protection Policy**

Caritas Sri Lanka –SEDEC is an expression of the concern of the Catholic Church in Sri Lanka for justice, peace and human development. It operates on the mandate of the Catholic Bishops’ Conference of Sri Lanka which is conferred to the Board of Management.

Caritas Sri Lanka –SEDEC is the National Secretariat of the Commission for Justice, Peace and Human Development of the Catholic Bishops’ Conference of Sri Lanka. In each Diocese Caritas Sri Lanka –SEDEC has its implementing Caritas Diocesan Secretariats. These are the secretariats of the Commission for Justice, Peace and Human Development of the respective Dioceses.

Caritas Sri Lanka –SEDEC is independent of all political parties and ethnic groups. It draws its inspiration from the teachings of the Lord Jesus Christ. His unconditional love for one another; and its mission is enrooted in the social doctrine of the Catholic Church.

The vision of Caritas Sri Lanka –SEDEC is to promote a culture of justice and peace Values which dwell as a common patrimony in the hearts every individual, families and the nation as a whole, and is embedded in the following vision statement:

Realization of a just Sri Lankan society based on the Gospel values of love, forgiveness, peace, unity and equality-lived, promoted and protected irrespective of caste, creed and nationality.

## **GENERAL DATA PROTECTION REGULATION**

Caritas Sri Lanka –SEDEC is committed to processing data in accordance with its responsibilities under the GDPR.

### **RESPONSIBLE PERSON**

The IT officer is responsible for the data protection of the organisation.

### **REGISTER OF SYSTEMS**

A register of all systems or contexts in which personal data is processed by Caritas Sri Lanka-SEDEC should be maintained.

#### **1) Data Protection Principles**

Caritas Sri Lanka –SEDEC 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

## **2) General Provisions**

- a) This policy applies to all personal data processed by Caritas Sri Lanka –SEDEC
- b) The IT Officer shall take responsibility for Caritas Sri Lanka-SEDEC on going compliance with this policy.
- c) This policy shall be reviewed as and when necessary.
- d) Caritas Sri Lanka –SEDEC shall register with the relevant authorities as an organisation that processes personal data.

## **3) Lawful, fair and transparent processing**

- a) To ensure its processing of data is lawful, fair and transparent, Caritas Sri Lanka – SEDEC 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 Caritas Sri Lanka-SEDEC shall be dealt with in a timely manner.

## **4) Lawful purposes**

- a) All data processed by the Caritas Sri Lanka -SEDEC must be done on one of the following lawful bases;  
Consent, contract, legal obligation, vital interests, public task or legitimate interests
- b) Caritas Sri Lanka –SEDEC 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 Caritas Sri Lanka –SEDEC systems.

#### **5) Data minimisation**

- a) Caritas Sri Lanka –SEDEC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

#### **6) Accuracy**

- a) Caritas Sri Lanka-SEDEC 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.

#### **7) Archiving/removal**

- a) To ensure that personal data is kept for no longer than necessary, Caritas Sri Lanka-SEDEC 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.


#### **8) Security**


- a) Caritas Sri Lanka-SEDEC 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 irrevocable.
- d) Appropriate back-up and disaster recovery solutions shall be in place.

#### **9) 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, Caritas Sri Lanka-SEDEC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to Information Commissioner's Office.

Approved by the Board of Management on 12<sup>th</sup> March 2019.

  
Fr. Mahendra Gunathileke  
**National Director**  
Caritas Sri Lanka – SEDEC

  
Rt. Rev. Dr. Joseph Vianney Fernando  
**Chairman**  
Caritas Sri Lanka – SEDEC