

# SOS Children's Villages International Integrity, Compliance & Legal



Accountable Now Webinar  
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## HOW TO PROTECT OUR DATA AND PRIVACY IN THE DIGITAL AGE?

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# How is the Digital Environment Challenging Data Protection?

- Rapid pace of **technological change**, new devices, new technology, etc.
- Increasingly **globalized** nature of data flows
- Personal information is collected, transferred and exchanged in **huge quantities**
- Data transfer in **milliseconds**
- The arrival of **cloud computing**, where individuals access computer resources remotely, rather than owning them locally
- **Employees** are now **broadcasters** and publishers via social networks
- Growing risk of **cyber security threats**
- ...



# #1: Close Coordination between Legal/ Data Protection and IT Department

- **Data protection** means the **legal** protection of an individual's **privacy** through regulating the processing of her/his **personal data** and safeguarding certain **rights** relating to this data.
- **Data security** means the protection of the integrity and confidentiality of data, **irrespective** of the information content and legal qualification of data.

Data security is served by **legal, technical and organisational** measures

- Complex network of **connections** between data protection and data security:
  - Most data protection laws contain rules on data security
  - Data security tools might be at least as effective tools for privacy protection as data protection laws are
  - Data security tools might be objects of legal regulation themselves (e.g., “strong” encryption)



- Personal data must be **collected** and **processed** **fairly and lawfully**

*Normally we can't just take information – we must explain why and what will happen to it, in compliance with the law.*

- Personal data must be **obtained for specified, defined purposes** and shall not be further processed in any manner incompatible with that purpose or those purposes

*This is aimed at the point of information collection. We don't collect information just in case it might be useful one day. We must tell people what we will use their data for.*

- Personal data must be **adequate**, **relevant and not excessive in relation to the purpose** or purposes for which they are processed

*We must not hold elements of data for which there is no need in the work we are doing.*

- Personal data must be **accurate** and **kept up to date**



- **Retention** – Personal data must **not be kept for longer than necessary** to fulfil the defined purpose/s
- Personal data shall be processed in accordance with the **rights of individuals**

*Rights of individuals include: right of access, i.e., to see a copy of the information an organisation holds about oneself; or the right in certain circumstances to have inaccurate personal data rectified, blocked, or erased etc.*

- **Security** – **Appropriate technical and organisational measures** must be taken against unauthorised or unlawful processing of personal data and against accidental loss, destruction of, or damage to personal data

*We must have appropriate security to prevent the personal data we hold being accidentally or deliberately compromised.*

- No transfer of personal data to **other countries** without **adequate protection**

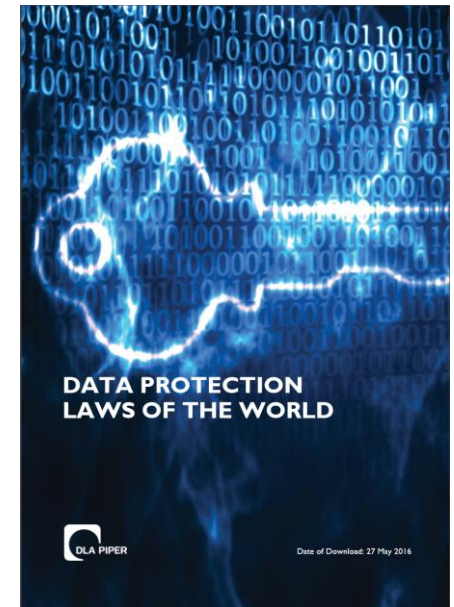
*Personal data shall not be transferred to another country or territory unless that country or territory ensures an adequate level of protection for the rights of data subjects*



## #3: Make Use of External Resources

- **DLA Piper's Data Protection Laws of the World Handbook:** This handbook from the global law firm *DLA Piper* sets out an overview of the key privacy and data protection laws and regulations across nearly 100 different jurisdictions.

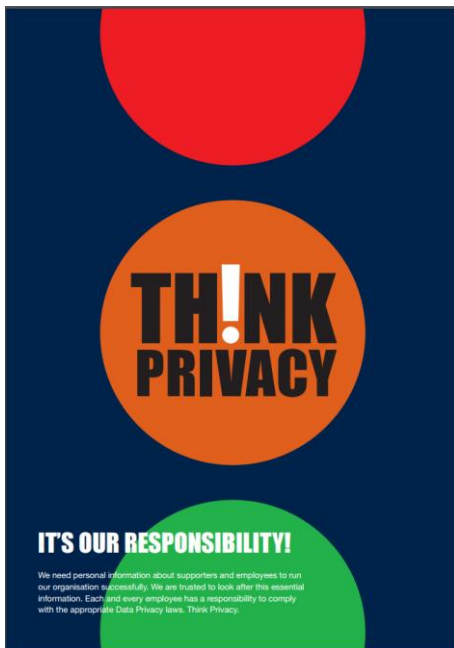
<https://www.dlapiperdataprotection.com/#handbook/world-map-section>



- **TH!NK PRIVACY Campaign:**

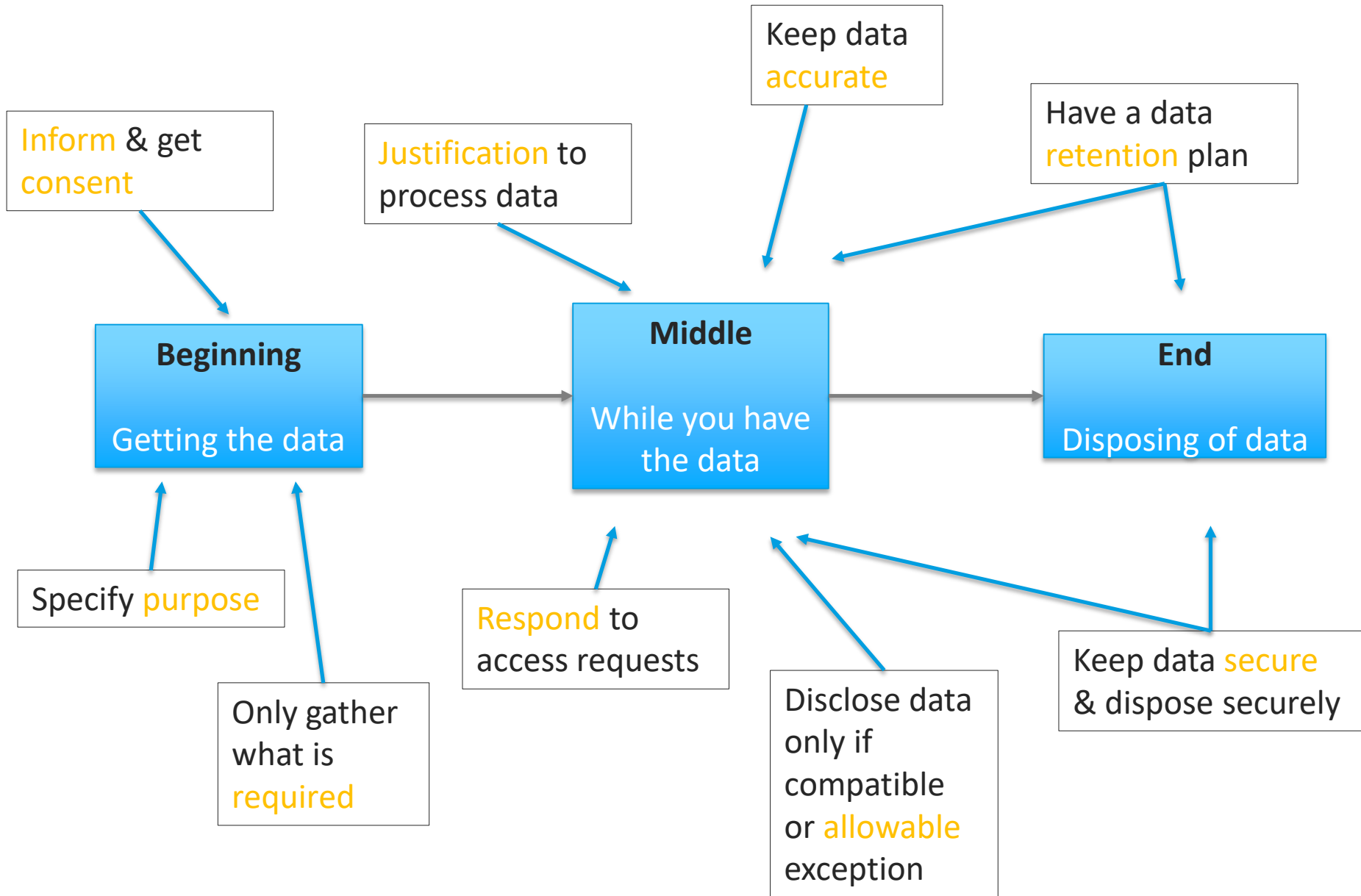
The *UK Information Commissioner's Office* provides free of charge materials designed by a specialist employee communication agency. The TH!NK PRIVACY campaign offers a range of downloadable materials including posters, stickers and postcards, to help you promote good data protection practice.

<https://ico.org.uk/for-organisations/improve-your-practices/posters-stickers-and-e-learning/>





# #4: Be Aware of the Entire Data Lifecycle







## Social Media

Photographs and other information about participants in the SOS programme must not be published on social media (such as Facebook) without their **consent** or the consent of the legal guardian.

(SOS Code of Conduct, Section 2.12, Fn. 5)



## What to attend to when to “talk” about SOS Children’s Villages?

- First of all clearly speak for **yourself** and not on behalf of the organization.
- Be sure to provide **valuable** information and content that is consistent with your work at SOS Children's Villages

- ...

## What is NOT allowed?

In very general terms any activity which could have a negative effect on SOS Children’s Villages.

However, following aspects shall always apply:

- Do not use social media for **official** marketing or public relations
- Don’t provide information which has been **classified** Internal Use Only, Confidential and Strictly Confidential in the Information Classification Standard
- Don’t quote colleagues or friends without **permission** ...

- ...

(SOS Global Intranet Obligatory Regulations)



SOS CHILDREN'S  
VILLAGES

GLOBAL INTRANET



## #6: Respect Workspace Day-To-Day Practical Tips

- **In the office:** Check the identity of who you are dealing with, keep documents and screens out of sight to others, use screen locks, passwords, secure printing, lock doors and filing cabinets.
- **Emails: Emails require extremely special care.**
  - Email is generally not a secure method of transmitting personal data – is there an **alternative** way? Can you restrict the amount of personal data included in the email?
  - Avoid **forwarding** 'whole' emails and 'email trails' containing several conversations, unless all of it is relevant and necessary. Take the time to remove unnecessary detail.
  - **Beware of the autocomplete function!** When you start to type in the name of the recipient, email programs often suggest similar addresses you have used before. It is very easy to accidentally select the wrong one without realizing. Sending an email to the wrong person may be a serious data protection breach. Always **double check the email address** you have selected before you hit send.





- “Governance in the digital era is *not* chiefly through rules, but through a combination of rules, processes, **values**, monitoring and **listening**, and the explicit development of infrastructure and services to **support** and shape how digitalization helps create value and opportunities.”

(Mark Brown, Director of Risk and Information Security at Ernst & Young, October 2014)

<b>Our Vision</b>	Every child belongs to a family and grows with love, respect and security.
<b>Our Mission</b>	We build families for children in need, we help them shape their own futures and we share in the development of their communities.
<b>Our Values</b>	<b>COURAGE</b> We take action
	<b>COMMITMENT</b> We keep our promises
	<b>TRUST</b> We believe in each other
	<b>ACCOUNTABILITY</b> We are reliable partners



Co-worker takes the fingerprint of a family father receiving a food distribution through the SOS Family Strengthening Programme in Kayes, Mali. © Jens Honoré



"All the children of the world are our children."

Hermann Gmeiner, founder of SOS Children's Villages

*Questions?*

Factors for  
success?

Your opinion?

Feedback?

Challenges?

Experiences?