

# General Data Protection Regulation (GDPR)

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## What is it?

- The European Union has adopted regulations to protect digital privacy of its residents.
- Information may only be used to advance the mission of the organization.
- Major focus is making sure that people consent to the use (commercial & other) of digital information that has been collected.
- Reasonable steps must be taken to prevent hacking of places that store information.
- GDPR encourages **psudonymization** (process of transforming stored data so that it cannot be attributed to a specific person without the use of additional information).
- Information that is no longer necessary for an organization's mission generally must be destroyed.

## Does it apply to us?

- Applies to any exchange that involves collection of or processing of personal data from a European Union resident.
  - Inbound Students from the European Union.
  - Outbound students to the European Union.
- Applies to information collected by our European Union partners. Our EU partners are subject to punishment if they provide us with information and we do not comply with the GDPR regulations.

## How do we comply?

- Give notice of intended use of information that we collect or process and obtain consent for its use.
- Protect the information from hacking.
- Districts, Host Families, Rotary Clubs, & Rotary volunteers must destroy electronic and paper documentation at the end of the exchange.
  - District retains access to information through the SCRYE database.
  - Clubs and host families allowed to retain basic contact information on students & families.
- SCRYE archives information 5 years after exchange and allows limited access to it through its Data Protection Officer.

## Notice

- The District shall use and disclose Confidential Information *solely as necessary* to facilitate The Rotary Youth Exchange Program.
- The SCRYE notice form lists how SCRYE and its member districts are likely to use information.

## Student Consent

- Acknowledges receipt of SCRYE policy
- Consents to use of information per SCRYE policy.
- Signed written consent should be obtained from:
  - All students regardless of age.
  - At least one parent, regardless of age of the student.
- Why does the parent have to sign?
  - GDPR requires parental consent for anyone under the age of 16.
  - Under US law, a minor (generally 18, but may be different in some states) has no legal authority to consent.

## Volunteer & Host Family Consent

- Acknowledges receipt of SCRYE policy
- Consents to use of information per SCRYE policy.
- Agrees to delete all paper and electronic information on students and host families.

## Club Certification

- Club agrees to follow SCRYE policy
- Club agrees to destroy information after exchange is over. (Club may retain basic contact information after exchange is over.)

## Student Application

- Uniform Student Application committee has not made a final decision on how to comply with GDPR.
- Most likely result appears to be for the sponsor and host districts to each attach their student consent form to the application so that an application will not be considered complete until the forms are attached.

## How do we comply?

- Provide students and parents with a copy of the SCRYE policy on release of information.
- Require signed consents from:
  - All inbound and outbound students and their parents.
  - Adult Host Family members.
  - Rotarian volunteers.
- Always use an encryption process to share information.
- Have security in place on the computers of all volunteers who have information stored.
- SCRYE database is secure.
- Delete information at end of exchange.
- Member districts and their clubs do their best to delete information on exchanges that are over.
- Appoint a qualified Data Protection Officer.

## What is the most difficult part about complying?

- Ensuring that the computers of our volunteers don't get hacked.
- Some strategies:
  - Use behind firewall.
  - Password protect access to computer and set computer to go to sleep shortly after it is no longer being used.
  - Encrypt all stored data.
  - Store data in part of computer that requires separate password.

## What information can districts & their clubs keep after the exchange?

- SCRYE forms generally allow you to keep:
  - Name (Student, Host Family members, Rotarians)
  - Their basic contact information
    - Address
    - Phone numbers
    - Email
  - Exchange year and school
  - Role served
  - Contact information about Club YEO and Counselor linked to host families and student

## What does SCRYE need to do?

- Pass the “*SCRYE Privacy Policy on Use and Disclosure of Confidential Information Obtained in Connection with the Rotary Youth Exchange Program.*”
- Appoint a Data Protection Officer.
- Add a feature on the database to archive information and restrict access to the archive to the SCRYE Data Protection Officer.
- Pay any additional cost for creating the archive feature.

## Questions?