

Personal Data Protection Commitment



ICCROM undertakes to:



Process personal data with due regard to ethical standards and all respect for the nature of the personal information being held



Have due regard and consideration for all parties whose personal data may be processed, and to **respect and respond promptly** to their requests regarding processing of their personal data



Limit the collection of personal data to those necessary to perform its activities



Make public its policy concerning personal data protection



Implement procedures to ensure that the measures in place to protect personal information are effective and updated regularly



Define and set up an appropriate system for the protection of personal data, including the identification of roles and responsibilities for those who handle personal data



Provide staff training and raise staff awareness concerning the principles of lawfulness, as well as security measures



Prevent and minimize the impact of potential breaches or unlawful and/or malicious personal data processing



Promote the inclusion of data protection principles in the activities of the Organization

Personal Data Protection

Roles and Responsibilities



ICCROM staff members have specific responsibilities in terms of data handling and protection. The main roles are as follows:

Data Controller



The Data Controller is the Organization itself, in the person of its legal representative



Responsibilities

Determines **the purposes** for which **and the manner** in which **personal data are processed**

Internal Data Processor



The Internal Data Processor is appointed by the Organization and guarantees adequate protection of personal data and the Organization's data



Responsibilities

- Advises on and implements **appropriate technical and organizational measures** to adequately cover the level of risk assessed by the Organization
- Examines **the Organization's plans and initiatives** for any impact they may have on personal data
- Acts as a **contact point** with any Data Protection Officer
- Reviews and updates the Organization's **personal data protection measures** and the Data Protection Manual

Persons authorized to process personal data



Anyone accessing personal data, expressly instructed to do so by the Data Controller



Responsibilities

Any person authorized to handle data, whether internal or external to the Organization, shall be informed about and trained in data processing and in measures available to protect personal data

IT Systems Manager



A professional responsible for the management and maintenance of IT systems that affect personal data processing



Responsibilities

Manages the **Organization's computer system to ensure functionality, security and preservation** of the system itself, as well as for other technical or maintenance purposes

Data Breach Team



A group of people composed of the Data Controller and a multi-disciplinary group of experts:

- Data Breach Team Head
- IT Systems Manager
- Data Protection Officer
- Internal Data Processor



Responsibilities

Manages **security breaches** and guarantees an **immediate, effective and professional response** in case of personal data breaches

Data Protection Officer



The Data Protection Officer brings independence, professionalism and skills in order to ensure that Data Subjects' personal information is adequately safeguarded



Responsibilities

- Supervises the **assignment of roles and responsibilities** and monitors awareness-raising policies, training and security procedures
- Assists the Data Controller, **informing and advising on data protection obligations** and on all operations concerning personal data management
- Aids in the **development of data protection impact assessments**