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

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

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

The Data Protection Officer brings independence, professionalism and skills in order to ensure that Data Subjects' personal information is adequately safeguarded and protected. This officer advises on and implements Data Protection policies, training and security procedures, and monitors awareness-raising and data protection impacts assessments.

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

The Data Breach Team is a multi-disciplinary group of experts: Data Breach Team Head, IT Systems Manager, and Data Protection Officer.

Anyone accessing personal data, expressly instructed to do so by the Data Controller, is considered a person authorized to process personal data.

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, and Internal Data Processor.

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

Responsibilities
• Acts as and implements appropriate technical and organisational measures to adequately cover the level of risk assessed by the Organization.
• Examines the Organization 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.

Responsibilities
• Manages any security breaches and guarantees an immediate, effective and professional response in case of personal data breaches.

Responsibilities
• 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.

Responsibilities
• Advise on and implement appropriate technical and organisational measures to adequately cover the level of risk assessed by the Organization.
• Examines the Organization 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.

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.

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

For any questions or clarifications, please contact: data-protection@iccrom.org