

Data Protection Policy

1) Introduction

- a) North American Maritime Ministry Association (NAMMA) is committed to treating information of employees, members, stakeholders, and other interested parties with the utmost care and confidentiality.
- b) Information protected by NAMMA includes personal data stored digitally and physical records containing personal data, such as employee personnel files, that form part of a structured filing system.
- c) The purpose of this policy is to ensure that we gather, store, and handle data lawfully, fairly, transparently, and with respect.
- d) A Data Protection Officer will be appointed by the NAMMA board.

2) Data Protection Principles

- a) There are several data protection principles that are common to applicable legislation. NAMMA and its entire staff must comply with these principles at all times in their information-handling practices.
- b) In brief, these principles require that personal data be:
 - i) Processed fairly and lawfully and must not be processed unless certain conditions are met in relation to personal data, including sensitive personal data. Sensitive personal data may only be processed with the explicit consent of the individual and consists of information relating to:
 - (1) Race or ethnic origin.
 - (2) Political opinions and trade union membership.
 - (3) Religious or other beliefs.
 - (4) Physical or mental health issues.
 - (5) Sexual preferences.
 - (6) Criminal offenses, both alleged and convicted.
 - ii) Obtained only for one or more specified and lawful purposes, and not processed in a manner incompatible with those purposes.
 - iii) Accurate and kept up-to-date. If your personal information changes (*i.e.* you change your address), you must inform NAMMA as soon as possible so that the records can be updated. NAMMA cannot be held responsible for any errors unless you have notified us in writing of the relevant change.
 - iv) Not kept for longer than is necessary. NAMMA will keep personnel files for no longer than six (6) years from the date of termination of employment. Some data will be retained for different time periods, depending on legal,

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operational, and financial requirements. Any data which NAMMA isn't required to hold for a specific period of time will be destroyed after one (1) year. Data relating to unsuccessful job applicants will be retained for six (6) months from the date of the application or interview.

- v) Processed in accordance with the rights of employees under US law.
- vi) Not transferred to any country or territory unless that country ensures an adequate level of protection for the processing of personal data.

3) Consent to Personal Information Being Held

- a) NAMMA holds personal data about its employees and, by signing a contract of employment, consent is given to that data being processed. This may include passing certain employment-related data to third parties, such as suppliers or contractor organizations supplying services, which require the use or creation of employee data. Agreement to the processing of personal data is a condition of employment.
- b) Limited sensitive personal data about its employees is also held and, by signing a contract of employment, explicit consent is given for the holding and processing of that data (*i.e.* sickness absence records, health needs and equal opportunities monitoring data).

4) Right to Access Personal Information

- a) Employees have the right, on request, to receive a copy of the personal information that is held by NAMMA, including personnel files, and to request that any inaccurate data be corrected or removed. Employees have the right on request:
 - i) To be told by NAMMA whether and for what purpose personal data is being processed,
 - ii) to be given a description of the data and contact information for the recipients to whom it may be disclosed, and
 - iii) to have communicated in an intelligible form the personal data concerned, and any information available as to the source of the data.
- b) Upon written request, NAMMA will provide you with a statement regarding the personal data held about you. This will state the description of personal data NAMMA holds and processes about you and the reasons for which they are processed.
- c) If you wish to make a complaint that these rules are not being followed with respect to personal data NAMMA holds about you, please contact the Data Protection Officer.

5) Obligations in Relation to Personal Information

- a) Employees should comply with the following guidelines at all times:

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- i) Do not give out confidential personal information except to the data subject. In particular, it should not be given to a member of the data subject's family or to any other unauthorized third party unless the data subject has given their explicit written consent to share any and/or all information.
 - ii) Be aware that those seeking information sometimes use deception in order to gain access to personal information. Always verify the identity of the data subject and the legitimacy of the request, particularly before releasing personal information by telephone. It is best practice to ask for the request in writing.
 - iii) Only transmit personal information between locations by fax or email if a secure network is in place. Ensure any personal data you hold is kept securely, either in a locked filing cabinet or, if computerized, password protected.
- b) Compliance with US law is the employee's responsibility. If you have any questions or concerns about the interpretation of these rules, discuss this with the Data Protection Officer.
 - c) If you are in any doubt about what you can or cannot disclose and to whom, do not disclose the personal information until you have sought further advice from NAMMA's Data Protection Officer.

6) Consequences

- a) Appropriate technical, organizational, and legal measures will be taken against unauthorized or unlawful processing of personal data and against accidental loss, destruction of, or damage to personal data.
- b) You should be aware that you can be criminally liable if you knowingly or recklessly disclose personal data in breach of US law.
- c) A serious breach of data protection is also a disciplinary offense and will be addressed by NAMMA's disciplinary procedures.
- d) If you access another employee's personnel records without authority, this constitutes a gross misconduct offense and could lead to disciplinary actions and subsequent termination.