



Draft IALA Data Protection Policy

1 Policy Statement

- 1.1 The International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) is committed to protecting the privacy and rights of individuals in accordance with the French *Loi Informatique et libertés* of 16th January 1978 as amended by the Law of 6th August 2004 (Data Protection Act, hereafter referred to as "The Law"). IALA needs to process certain personal data about its employees and other individuals to fulfil its purpose and to meet its legal obligations. IALA will process all such personal information, whether in a paper filing system or in electronic format, in accordance with the Law.
- 1.2 IALA has developed this policy to seek to ensure that all those who process personal information on its behalf do so in accordance with The Law.
- 1.3 IALA will ensure that appropriate security measures are in place to protect personal information against unlawful or unauthorised use or disclosure, accidental loss, destruction or damage.
- 1.4 All employees and other individuals shall have the right of access to their personal information, as allowed by law, to ensure that it is correct and fairly held.
- 1.5 IALA will make sufficient resources available to ensure compliance with this policy.

2 Scope

- 2.1 This policy applies to all IALA employees and other individuals when processing personal information on behalf of IALA.

3 Distribution

IALA Policies and Procedures

Data Protection Policy

Annex 1

1. **IALA shall process personal information in accordance with the principles of the *Loi Informatique et libertés* (The Law), namely personal information shall:**
 - 1.1 be processed fairly and lawfully and with the individual's consent or in accordance with Article 7 of The Law, as amended;
 - 1.2 be obtained for specified and lawful purposes and shall not be processed in any manner incompatible with those purposes;
 - 1.3 be adequate, relevant and not excessive;
 - 1.4 be accurate, complete and if necessary up to date;
 - 1.5 be kept in a manner that permits individuals' identification and not for longer than is necessary;
 - 1.6 be processed in accordance with the rights of the individual as set out in The Law;
 - 1.7 be kept confidential and processed securely;
 - 1.8 not be transferred to another country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.
2. **IALA shall not collect or process personal data that are in relation to:**
 - 2.1 ethnic origins;
 - 2.2 political opinions;
 - 2.3 religion;
 - 2.4 health or sexual preferences.
3. **Responsibilities**
 - 3.1 The Secretary-General has overall responsibility for ensuring compliance with the Data Protection Policy. All Executive Officers have a responsibility for implementing the policy within their particular field of authority.
 - 3.2 The Secretary-General is responsible for ensuring that the Data Protection Policy is maintained and that all other policies are consistent with the Data Protection Policy and are cross-referenced where necessary.
 - 2.4 The Administration and Finance Manager shall be responsible for formally notifying the Secretary-General as necessary of the personal information processed by IALA and for ensuring that employees are aware of IALA's obligations in relation to the processing of personal information. Any individual who has a matter of concern in respect of the processing of personal information may raise it with the Secretary-General.
 - 2.5 The Administration and Finance Manager shall be responsible for ensuring that HR and IT systems are fully compliant with this policy.
 - 2.6 All IALA employees are required to process personal information in accordance with the principles set out in Section 1 of this Annex and to exercise the highest level of care and confidentiality in relation to such information. Failure to comply with this policy will be treated as a serious matter and in some situations may amount to gross misconduct.