**[ISACA] (“Port Harcourt Chapter”) Internal Privacy Policy**

Adopted 08 February 2020

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| **Scope** | This policy outlines Port Harcourt Chapter policies with respect to the treatment of the personally identifiable information (PII)[[1]](#footnote-1) of the following individuals:   * Members (both current and past); * Event attendees, speakers, sponsors, survey respondents, and other participants in Port Harcourt Chapter programs; and * Non-member volunteers who participate on Port Harcourt Chapter projects and/or volunteer groups.   This policy does not describe Port Harcourt Chapter policies with respect to personally identifiable information of employees, consultants, contractors, vendors, licensees, sponsors, or advertisers.  This policy applies to handling of personally identifiable information stored in all forms (whether on paper, electronically – including on computer hard drives, CD ROMs, removable flash drives – or otherwise) by Port Harcourt Chapter. It does not describe the treatment of information by legally independent entities that may work with Port Harcourt Chapter, including ISACA International.  This policy is for internal use by Port Harcourt Chapter volunteers, employees and by others (such as contractors, vendors, committee members, and the like) who have access in the course of their duties for Port Harcourt Chapter to PII (as defined below) maintained by or on behalf of Port Harcourt Chapter. |
| **Responsibility and Accountability** | Port Harcourt Chapter Secretary is responsible for Port Harcourt Chapter’s privacy program, which responsibilities include:     * Maintain data privacy, per Port Harcourt Chapter and ISACA policies, as well as local regulations. * Ensure the Conflict of Interest Statements and Willingness to Serve Agreements are signed by each volunteer when they take on their role. Maintain originals of these signed records. * Assist the Port Harcourt Chapter president with establishing a Port Harcourt Chapter calendar, including target dates for task completion. * Compare records with previous periods to determine the percent increase/decrease in membership. Provide comparison to membership director. * Manage surveys of the Port Harcourt Chapter membership. * Manage all correspondence pertaining to or on behalf of the Port Harcourt Chapter. Assist in writing and mailing all correspondence on behalf of the Port Harcourt Chapter. * Collaborate with the Port Harcourt Chapter board to manage legal affairs. * Update Port Harcourt Chapter bylaws according to changes put forth by the Port Harcourt Chapter board, as approved. * Submit reports to ISACA for compliance and award eligibility. |
| **Notice** | Port Harcourt Chapter provides notice about its policies and practices relating to personally identifiable information and identifies the purposes for which information is collected, used, stored shared, and secured. Port Harcourt Chapter’s notice program includes the following elements:   * When feasible (and/or legally required) Port Harcourt Chapter provides notice to individuals before their personally identifiable information is collected. * Port Harcourt Chapter provides notice and obtains consent (as legally required) before information it maintains is used for a purpose that is either unrelated to the purpose for which the information was originally provided, or that is for a purpose that was not disclosed in the original notice to the individual. * Port Harcourt Chapter provides external notice about its privacy practices on its website. The notice describes how personally identifiable information is collected, used, stored, and shared, and secured. * Port Harcourt Chapter provides notice in its various printed information collection forms about how personally identifiable information will be used. * Port Harcourt Chapter also provides notice in situations other than traditional online or offline information collection, such as when people are taking surveys or attending meetings, and instructs its employees about when notice must be provided. * This Internal Privacy Policy is used to inform Port Harcourt Chapter personnel (and others, such as volunteers, contractors, etc., who will access personally identifiable information maintained by Port Harcourt Chapter and who have a responsibility to adhere to this policy) about Port Harcourt Chapter’s responsibilities with respect to use of personally identifiable information, and is distributed to personnel along with the external privacy notice |
| **Collection** | Port Harcourt Chapter currently collects the following types of personally identifiable information (for the purposes described in the “use” section of this policy) Names, Telephone, Email, Addresses, signature  Port Harcourt Chapter collects information in a variety of ways, online or offline. In the online environment, Port Harcourt Chapter uses some common passive data collection mechanisms, including cookies.  Port Harcourt Chapter uses fair and lawful means to collect information, collects information using methods that have been reviewed and approved by the Port Harcourt Chapter designee responsible for the Port Harcourt Chapter privacy program, and analyzes third-party sources of personally identifiable information to determine if those third parties are reliable data providers.  It is Port Harcourt Chapter’s policy not to develop or acquire additional information about those individuals whose personal information is covered by this policy, unless it has obtained consent from those individuals. Certain exceptions apply, including to build behavioral profiles or to obtain information to verify applicants for courses or certification |
| **Choice and Consent** | To the extent feasible – keeping in mind Port Harcourt Chapter’s legal obligations, business goals and resources – Port Harcourt Chapter gives individuals choice about how their information will be used. This choice includes, for example, seeking consent and/or providing clear notice about use of personally identifiable information.  Port Harcourt Chapter informs individuals what choices they have about how information will be used, stored, or shared with third parties. The following are some representative examples of the types of situations when Port Harcourt Chapter gives individuals choice or seeks consent to use of photographs, presentation papers. |
| **Use** | Port Harcourt Chapter uses personally identifiable information it obtains for the following purposes:   * Those purposes described in Port Harcourt Chapter’s external privacy policy, and as described at the time it collects information (for example in an online or offline form); * To process individuals’ requests; * For purposes that a reasonable individual would view as related to the purpose for which an individual provided information; and * For other legitimate business purposes of Port Harcourt Chapter that are permitted by applicable laws, rules and regulations, and/or that are in keeping with appropriate industry guidelines and practices. |
| **Sharing** | Port Harcourt Chapter shares personally identifiable information with third parties only for legitimate business purposes and as permitted by applicable law, rules and regulations. Instances when Port Harcourt Chapter may share information include:   * To vendors or third-party to deliver or provide goods and services, including, for example, exam testing agencies and training providers and partners, product-fulfillment companies, or third-party event hosts; * To the IT Governance Institute, ISACA Headquarters, and from time to time volunteers (such as ISACA board members) performing tasks on Port Harcourt Chapter’s behalf; * To those who wish to determine if an individual is certified provided that the requester of the information provides to Port Harcourt Chapter the certification number and last name of the individual; * To investigate potentially fraudulent or questionable activities; * In anticipation of and in the course of an actual or potential sale, reorganization, consolidation, merger, or amalgamation of all or part of Port Harcourt Chapter’s business or operations; and * When Port Harcourt Chapter believes it is necessary to cooperate with law enforcement or in response to a government request.   Individuals are notified of Port Harcourt Chapter’s practices with respect to the sharing of information with third parties in Port Harcourt Chapter’s external privacy policy, accessible on the Port Harcourt Chapter website.  When sharing information, Port Harcourt Chapter limits the amount and type of information shared to that which the other party needs or that is relevant to the other party.  If Port Harcourt Chapter shares personally identifiable information with a vendor or other third-party providing services on Port Harcourt Chapter’s behalf, Port Harcourt Chapter requires that the third party use the data as directed by Port Harcourt Chapter and that it maintain the confidentiality and security of the data.  Port Harcourt Chapter will take appropriate remedial actions if it becomes aware of any situation in which a third-party misuses personally identifiable information. |
| **Access** | Those who wish to access their information or have their information updated are directed in Port Harcourt Chapter’s external privacy policy to contact Port Harcourt Chapter by email, regular mail, or phone. Such requests will be answered and addressed under the direction and supervision of Port Harcourt Chapter designee responsible for the Port Harcourt Chapter privacy program. |
| **Completeness and Accuracy** | Port Harcourt Chapter relies on individuals to provide it with complete and accurate personally identifiable information, and in certain circumstances may require individuals to represent and warrant that the details they have provided are their own, are complete, and are accurate. |
| **Retention and Disposal** | Port Harcourt Chapter’s current policy is**:** to retain information for so long as it is needed by the association. Since most information is in continuous use, much is retained on an indefinite basis].  When Port Harcourt Chapter finds that it has extensive information it is not using, it will determine appropriate means to dispose of personally identifiable information in a secure manner in keeping with its legal obligations. |

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1. Defined to include any information that could be used to directly or indirectly identify an individual, such as name, email or home address, phone number, as well as information that is maintained in connection with individually identifiable information, like credit card numbers, demographic information, and the like. [↑](#footnote-ref-1)