

# ETHIOPIAN TRANSLATORS ASSOCIATION (ETA)

## DATA PROTECTION AND PRIVACY POLICY

### 1. Purpose

The purpose of this **Data Protection and Privacy Policy** is to establish clear guidelines for the handling of personal data by the Ethiopian Translators Association (ETA). This policy ensures that ETA and its members comply with relevant data protection laws and best practices for protecting sensitive information, safeguarding individuals' privacy, and maintaining trust.

This policy outlines the principles and procedures regarding the collection, storage, and processing of personal data, as well as the rights of members and clients with regard to their data. It also addresses how ETA will respond to data breaches and enforce penalties for non-compliance.

### 2. Data Protection Principles

ETA is committed to ensuring that personal data is handled in accordance with the following key principles:

- **Lawfulness, Fairness, and Transparency:** Personal data is collected and processed in a lawful, fair, and transparent manner.
- **Purpose Limitation:** Data is collected for specified, legitimate purposes and is not further processed in ways incompatible with those purposes.

- **Data Minimization:** Only the personal data necessary for the intended purpose will be collected.
- **Accuracy:** Personal data must be accurate and, where necessary, kept up to date.
- **Storage Limitation:** Personal data is kept only for as long as necessary for the purposes for which it is collected.
- **Integrity and Confidentiality:** Personal data is processed in a manner that ensures appropriate security, including protection against unauthorized access, disclosure, alteration, and destruction.
- **Accountability:** ETA is responsible for ensuring compliance with these principles and must be able to demonstrate this compliance.

### **3. Collection, Storage, and Processing of Personal Data**

#### **3.1 Types of Personal Data Collected**

ETA may collect the following types of personal data from its members, clients, and other individuals with whom it interacts:

- **Identification Information:** Name, contact details (email, phone number), nationality, and professional credentials.
- **Membership Information:** Membership status, payment details, participation in events, training, and certifications.
- **Transaction Information:** Payments, donations, and financial transactions related to ETA activities.

- **Communication Information:** Correspondence with ETA, including emails, meeting records, and feedback.
- **Sensitive Data:** Where necessary, data related to health or disabilities for accessibility purposes, or data related to religious or political affiliations where applicable.

### 3.2 Methods of Data Collection

- Personal data is collected directly from individuals via registration forms, online platforms, emails, and in-person meetings.
- Personal data may also be collected indirectly from third parties (e.g., public databases, official records) where applicable, with the consent of the individual concerned.

### 3.3 Data Storage

- All personal data is stored securely in physical or electronic form.
- Personal data in electronic form is stored on **secure servers** with encryption and regular backup systems.
- Access to personal data is restricted to authorized personnel only, and access is granted based on a need-to-know basis.
- Paper records, if any, are stored in **locked cabinets** in a secure location.

### 3.4 Data Processing

- Personal data will only be processed for the purposes for which it was collected (e.g., membership management, communication, event organization).

- ETA ensures that any third-party service providers involved in processing personal data comply with this policy and implement adequate data protection measures.

## **4. Responding to Data Breaches**

### **4.1 Identifying a Data Breach**

A data breach is defined as any unauthorized access, disclosure, alteration, or destruction of personal data.

ETA considers the following events as data breaches:

- Unauthorized access to personal data by staff or third parties.
- Loss or theft of personal data.
- Accidental alteration, destruction, or corruption of data.
- Disclosure of personal data inappropriately, either internally or externally.

### **4.2 Procedures for Responding to Data Breaches**

#### **1. Immediate Reporting:**

Any suspected or actual data breach must be reported immediately to the **General Manager** and the **Data Protection Officer (DPO)** if one is appointed.

#### **2. Containment and Assessment:**

The incident will be assessed to determine the scale of the breach and to implement measures to contain it and prevent further unauthorized access.

### 3. **Investigation:**

ETA will investigate the cause of the breach, the extent of data compromised, and which individuals were affected.

### 4. **Notification:**

- If the breach poses a **high risk** to the rights and freedoms of individuals, ETA will notify affected members or clients without undue delay.
- ETA will also notify relevant authorities (e.g., national data protection authorities) within **72 hours** of identifying the breach, if required by law.

### 5. **Documentation:**

ETA will document all details of the breach, including actions taken and lessons learned to improve data protection measures.

## 4.3 Preventive Measures

- ETA will conduct regular risk assessments and staff training to prevent data breaches.
- Access to sensitive data will be **restricted** and closely monitored to ensure data security.
- ETA will maintain an updated **data breach response plan** to ensure swift and efficient handling of any incidents.

## **5. Rights of Members and Clients Regarding Their Data**

### **5.1 Right to Access**

Members and clients have the right to request access to their personal data held by ETA. Requests must be made in writing, and ETA will respond within **30 days** of the request.

### **5.2 Right to Rectification**

Members and clients have the right to request the correction of inaccurate or incomplete personal data. ETA will ensure that such requests are processed promptly.

### **5.3 Right to Erasure (Right to be Forgotten)**

Members and clients may request that their personal data be erased if it is no longer necessary for the purpose for which it was collected, or if consent is withdrawn (where applicable).

### **5.4 Right to Restrict Processing**

Members and clients have the right to request the restriction of processing their data if:

- The accuracy of the data is contested.
- Processing is unlawful and the individual objects to erasure.
- ETA no longer needs the data but the individual requires it for legal claims.

### **5.5 Right to Data Portability**

Where applicable, members and clients have the right to receive their personal data in a structured, commonly used, and machine-readable format, and to transfer it to another organization.

## 5.6 Right to Object

Members and clients may object to the processing of their data for certain purposes, including marketing or profiling, and ETA will cease such processing unless there are legitimate grounds to continue.

## 6. Penalties for Non-Compliance

### 6.1 Non-Compliance with Data Protection Policies

Any member, staff, or third-party service provider found in violation of this policy may face the following penalties:

- **Warnings** or **disciplinary action** for minor infractions.
- **Suspension** of membership or termination of contracts for more severe violations.
- **Legal action** and referral to relevant authorities in cases of gross misconduct, such as data theft or fraud.

### 6.2 Non-Compliance with Data Breach Procedures

Failure to report or address data breaches promptly may result in:

- **Internal disciplinary action** including warnings, suspension, or termination of membership.
- **Legal consequences** including potential fines or legal claims in accordance with applicable data protection laws.

## 7. Policy Review and Amendments

This **Data Protection and Privacy Policy** will be reviewed regularly by the **Executive Committee** and updated as necessary to ensure compliance with evolving data protection laws and best practices.

- **Amendments** to this policy must be approved by the **General Assembly**.
- Members will be notified of any significant changes to the policy.

## **8. Conclusion**

The **Data Protection and Privacy Policy** ensures that ETA adheres to the highest standards of data protection, respects the rights of individuals, and safeguards personal information. This policy promotes **transparency, accountability, and trust** within ETA's operations.

**Approved by:**

**Ethiopian Translators Association (ETA)**