



GDPR Guidelines

About Us

Healing Venezuela is charity registered in England and Wales No. 11700709 based in London to relieve and to preserve the health of the patients of hospitals and other health-related institutions in Venezuela by:

- 1) PROVIDING OR ASSISTING IN THE PROVISION OF HEALTH-RELATED SUPPLIES;
- 2) PROVIDING SUPPORT IN THE IMPROVEMENT OF MENTAL HEALTH AND
- 3) ENABLING THE EXCHANGE OF MEDICAL EXPERTISE, AND ADVICE TO VENEZUELAN DOCTORS AND HOSPITALS

Our values are:

Gratitude: any donation, small or large, matters and is valuable to us.

Respect: at Healing Venezuela we have no political or religious affiliation, we respect all the creeds and political affiliations and we expect the same from others.

Transparency: a transparent management of the resources of our organisation is a Paramount value at Healing Venezuela.

Collaboration: at Healing Venezuela we believe that working with other organisations with the same objective we can optimise the efficiency of our work

Community: we believe in creating a community of both Venezuelans and British citizens to support patients in Venezuela

Objective of the document

To keep interested parties informed about the charity activities is necessary for the performance of a task carried out in the public interest as stated by the Charity Commission. The EU General Data Protection Regulation (GDPR) established in 2018 is the European regulation for the management of individual personal data. The key of the regulations is that organization who deal with the public and used individuals data, must demonstrate how the data subject has consented to the processing of their personal data. As a registered charity in the UK, we process personal data about EU residents and overseas, therefore GDPR applies to us.

HV Privacy Policy has been reviewed to be GDPR compliant and these guidelines will be updated as the scope of the charity expands. We don't collect data of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

The objective of this document is to provide guidelines for the use of the data we collect at Healing Venezuela. In Annex 1 is included the Privacy Policy GDPR compliant available on our website and to individuals who subscribe to our site. In Annex 2 is included a checklist of the considerations made to be GDPR compliant.

**IF YOU WISH TO RAISE A QUERIE OR MAKE A COMPLAINT, PLEASE SEND AN EMAIL TO:
INFO@HEALINGVENEZUELA.CO.UK SPECIFYING THE NATURE OF YOUR QUERIE OR
COMPLAINT**

Definitions

GDRP

The EU General Data Protection Regulation (GDRP) is the new (2018) European regulation for the management, collection and use of personal data. The key of the regulations is that organization who deal with the public and used individuals data, must demonstrate how the data subject has consented to the processing of their personal data.

Personal data is information that relates to an identified or identifiable individual. What identifies an individual could be as simple as a name or a number or could include other identifiers such as an IP address or a cookie identifier, or other factors. If it is possible to identify an individual directly from the information you are processing, then that information may be personal data. Personal data is information that relates to an identified or identifiable individual. What identifies an individual could be as simple as a name or a number or could include other identifiers such as an IP address or a cookie identifier, or other factors. If it is possible to identify an individual directly from the information you are processing, then that information may be personal data.

What are identifiers and related factors?

An individual is 'identified' or 'identifiable' if you can distinguish them from other individuals. A name is perhaps the most common means of identifying someone. However, whether any potential identifier actually identifies an individual depends on the context.

A combination of identifiers may be needed to identify an individual.

The GDPR provides a non-exhaustive list of identifiers, including:

- name;
- identification number;
- location data; and
- an online identifier. Online identifiers' includes IP addresses and cookie identifiers which may be personal data.
- Other factors can identify an individual.

Principles

The GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)

- Accountability

Road Map

Healing Venezuela collects data in different ways.

1) Website: this is the primary way to collect individuals' names and emails via a subscription form which requires to double-confirm their desire to be kept informed of what the charity's activities are. Only these individuals receive marketing information (events) from the charity. The data from these individuals is transferred to the charity Mailchimp account to a list called: Healing Venezuela Events. Every email sent to the recipients of this list has the opt-out link clearly stated.

2) Personal contact: from time to time, people show genuine interest in the charity's activities but haven't registered on the website. It can be family, friends or donors who have a legitimate interest in receiving information about the charity's activities. These individuals only receive the quarterly newsletters. Their data is transferred to the charity Mailchimp account to a list called Healing Venezuela Newsletters. Every email sent to the recipients of this list has the opt-out link clearly stated.

We don't collect locations or identification numbers. On-line identification (IP Addresses) are collected via the website software for SEO purposes.



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Annex 1

Privacy Policy as Stated on Healing Venezuela Website

Privacy Policy

We are delighted that you have shown interest in our charity. Healing Venezuela manage and administer this website. For the purpose of the Data Protection Act 1998 and the General Data Protection Regulation 2016/679, we are the “Data Controller” in respect of the “Personal Data” (as defined below). Data protection is a high priority for Healing Venezuela. This Privacy Policy sets out the basis upon which we collect and process personal data

The use of our web page, www.healingvenezuela.org, is possible without any need of personal data. However, if you want to subscribe to our newsletter or you want to hear from us via our website, processing of personal data could become necessary. If the processing of personal data is necessary, we will ask for consent.

The processing of personal data, such as the name, address, e-mail address, or telephone number shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Healing Venezuela. By means of this data protection declaration, our organisation would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

Healing Venezuela has implemented measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, feel free to transfer personal data to us via alternative means, e.g. by telephone or post.

1. Definitions

Healing Venezuela data protection declaration is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, *inter alia*, the following terms:

a) Personal data

Personal Data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

- c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such

additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

h) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

j) Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

k) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Healing Venezuela
Board of Trustees
9 Bramah House
SW1W 8DQ London
United Kingdom
Phone: +447852766001
Email: info@healingvenezuela.co.uk
Website: www.healingvenezuela.org

3. Collection of general data and information

Healing Venezuela website collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Healing Venezuela does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Healing Venezuela analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

4. Registration on our website

The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more

processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations.

5. Subscription to our newsletters

On Healing Venezuela website, users are given the opportunity to subscribe to our newsletter which purpose is to inform donors and supporters regularly about our projects, events and activities in general. The newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter and/or inform about upcoming events. In addition, subscribers may be informed by e-mail of modifications to the newsletters, or in the event of a change in technical circumstances. There will be no

transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for receiving the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller emailing to: info@healingvenezuela.co.uk

6. Newsletter-Tracking

Healing Venezuela newsletters contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of our campaigns. Based on the embedded tracking pixel, Healing Venezuela may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analysed by the controller in order to optimize the newsletter content to adapt it to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. Healing Venezuela automatically regards a withdrawal from the receipt of the newsletter as a revocation.

7. Contact possibility via the website

Healing Venezuela website contains information that enables a quick electronic contact, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

8. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

9. Rights of the data subject

a) Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any controller's member.

b) Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any Trustee of the controller.

c) Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any Trustee of the controller.

d) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Healing Venezuela, he or she may, at any time, contact any Trustee of the controller. A Trustee of Healing Venezuela shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those

personal data, as far as processing is not required. Healing Venezuela's controller will arrange the necessary measures in individual cases.

e) Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Healing Venezuela, he or she may at any time contact any member of the Board of Trustees (controller). Healing Venezuela will arrange the restriction of the processing.

f) Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any Healing Venezuela Board Trustee.

g) Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Healing Venezuela shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Healing Venezuela processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Healing Venezuela to the processing for direct marketing purposes, Healing Venezuela will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Healing Venezuela for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any Trustee of Healing Venezuela. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Healing Venezuela shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at

least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any Healing Venezuela Trustee.

i) Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any volunteer.

10. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

11. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our activities for the well-being of all our collaborators and beneficiaries.

12. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

13. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject might, for example, be obliged to provide personal data when Healing Venezuela signs a cooperation agreement. The non-provision of the personal data would have the consequence that the agreement with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact a Trustee. The Trustee must clarify to the data subject whether the provision of the personal data is required by law or agreement or is necessary for the conclusion of the agreement, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

14. Existence of automated decision-making

As a responsible organisation, we do not use automatic decision-making or profiling.

ANNEX 2

ANNEX 2 GDPR CHECKLIST Healing Venezuela

Does GDPR apply to HV?

YES, we are based in the UK and we process personal data about EU residents. We are able to track on-line identity.

Does HV process data that GDPR applies to?

YES, we process data that can identify an individual (including cookies and IP addresses) wholly or partly through automated means or manually as part of a filing system.

What data does HV process and for what purpose?

We have created a Roadmap of the types of data we process included in the guidelines. As the guidelines are updated, so is the Roadmap

Does HV process sensitive data?

No, HV doesn't collect data of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation

Does HV have lawful grounds for each of the processing activities?

YES • the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

YES • processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; i.e.: donors want to know what we do with the money

NO • processing is necessary for compliance with a legal obligation to which the controller is subject; GDPR

NO • processing is necessary in order to protect the vital interests of the data subject or of another natural person;

YES • processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

YES • processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Has HV identified all transfers to third parties and what country the third party is in?

HV doesn't transfer to third party the data it processes

Does HVE have a GDPR compliant Privacy Notice?

Yes, an updated Privacy Policy GDPR compliant is available on HV Website and when individuals sign up.

Has HV sent the GDPR compliant Privacy Notice to subscribers?

YES, HV has sent several emails to share the new policy and to confirm GDPR compliance. Also, every time an email is sent, the opt-out link is available

Has HV obtained GDPR compliant consent for electronic marketing communications?

YES

Has HV obtained GDPR compliant consent for processing sensitive data?

NA, HV doesn't process sensitive data

Has HV put in place a system for managing opt outs/ withdrawing of consent?

YES, our email marketing provider keeps a record of opt outs.

Has HV put in place GDPR compliant Processor Agreements with the third parties to whom I transfer personal data?

NA, HV doesn't use a third-party processor (eg payroll, software providers etc).

Has HV put in place a system for data subject requests?

HV will provide any data subject request within 30 days

Does HV need to appoint a Data Protection Officer?

As a small charity, we don't think we need one. The Administrator is overall responsible for the lawful management of data