

## Volt Europa - Data Protection Report 2021

### Data Protection Officers

Since summer 2020, two dedicated members are the DPOs of Volt Europa. They can be contacted at [dpo@volteuropa.org](mailto:dpo@volteuropa.org).

### Data Governance

One of the DPOs continues her participation in the "Governance Commission".

### Accountability

The "Data Protection Library", placed on *Google Drive*, was updated. It is a collection of relevant data protection documents.

### Rights of the data subject

Many requests about rights of data subjects reached the DPOs. We coordinated the requested actions (information, correction or deletion) in close cooperation with the Secretary General and the TechTeam.

### Personal data breach

At the end of December 2021, the General Secretary and the DPO received notification of a data breach. A Dutch journalist announced on Twitter that he had received member data of Volt members from at least the Netherlands and Belgium. The GS and Dutch DPO took the steps that needed to be taken in this situation and the EUR DPOs were always kept informed. It seemed that a Volt member with access to this personal data transferred it to the journalist. To prevent such data breaches in the future, GS, TechLeads and DPO are in contact. The necessary measures will be taken in 2022.

### Data Processing Agreements

Some Data Processing Agreements and "Joint Controllership Agreements" are in process.

### Technical and organisational measures [TOM]

The DPOs continued the documentation of technical and organisational measures. They adhered to the relevant processes, and answered corresponding questions of

functional teams and national chapters.

## **Records of processing activities**

There is no obligation to keep records of processing activities for us. Nevertheless it is favourable to have an overview of this. The DPOs updated this register.

## **Risk assessment**

If the data processing “is likely to result in a high risk for the rights and freedoms of natural persons” [Art. 35 (1) GDPR] a Data Protection Impact Assessment (DPIA) is required.

The DPOs’ analysis of requests for a risk assessment led them to conclude that no DPIA was needed, but that it was important to consider it in the first place.

## **National chapters**

If requested, the DPOs advised national chapters on questions related to data protection.

Volt España asked them to take on the role of national DPO until a qualified member was found. DPO Robert Seifert agreed to take on this task for a limited time.

## **Perspective**

The growth of the organisation brings new data protection challenges. To stay aware of data protection considerations in Volt Europa requires continuous checks, advice and proposals for the whole organisation.

## **December 2021**

By the Data Protection Officers