

## Volt Europa - Data Protection Report 2020

### Data Protection Officers

Mariano delli Santi had ended his activities as DPO because a change in his job did not leave him time to continue. Thanks a lot to him for his activity the time before.

The Board appointed Robert Seifert in July and Mistale Taylor in August as new DPOs.

### Data Governance

DPO Mistale Taylor takes part in the new founded "Governance Commission".

The DPOs keep an eye on the declaration of data policy, which has to be included in websites, so Volt Europa can publish a legal adequate and sufficient version.

The DPOs gave advice on how to modify privacy documents on national websites.

### Accountability

The "Data Protection Library", placed on *Google-Drive*, was started in November. This collection of relevant data protection documents serves as a reference book for Volt as well as complying with Art. 5 (2) GDPR to supervisory authorities. This project will be continued in 2021.

### Rights of the data subject

Several requests reached the DPO. We coordinated the requested actions in close cooperation with the Tech Lead Jose Antonio Abellan Lax. Some requests concerned information about personal data, others concern the deletion of data, mostly about e-mail accounts that are no longer used.

This led to a general guideline. The DPOs submitted a proposal to the Bord of Volt Europa for "**Guidelines for handling requests relating to the rights of data subjects (Art. 15 - 22 GDPR)**", which the Board approved in December.

An information sheet for data subjects according to Art. 13 GDPR was set up and placed in the "Data Protection Library" where anyone can read and download the information we are obliged to provide.

### Joint Contollership

The work of the "Data Processing Agreement Working Group" was taken up and continued. Drafts for a "Joint Controllershship Agreement" according to Art. 26 GDPR was sent to some national chapters of Volt, such as Germany, the Netherlands and Italy.

In December the Agreements with Germany and Netherlands were established by the European Board and the national Boards. More agreements with other Member Associations will follow next.

### Technical and organisational measures [TOM]

According to Art. 25 and 32 GDPR there are processing contracts needed with external processors, e.g. software suppliers. The DPOs started an overview and arranged the completion of the contracts and agreements.

## Records of processing activities

There is no obligation to keep records of processing activities for organisations employing fewer than 250 persons, except if there are special risks [Art. 30 (5) GDPR].

Nevertheless it is favorable to have an overview about this. So the DPOs started to build a register of processing activities; it will be continued in 2021.

## 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. This is obvious e. g. for health data. The DPOs help to analyse, if a specific processing needs a DPIA. If it is needed, a special software tool developed in France, adopted by German authorities, guides through the process of establishing the DPIA or the DPO can conduct a DPIA following the ICO model.

Until now the DPOs were involved in one software development. We could find out that therefore no DPIA is needed.

## Personal data breach

Rules for handling of data breaches according to Art. 33 – 34 GDPR are not yet defined. This will be a project for 2021.

## National chapters

Beyond the topics mentioned above there have been some contacts to know each other and to discuss advice for national data governance.

## Perspective

There is a high level of awareness of data protection in Volt Europa. We will help to take the legally correct measures for this.

We want to complete the "Data Protection Library" to be able to demonstrate compliance with the GDPR and show accountability as Art. 5 GDPR demanded.

We will work for more "Joint Controllship Agreements" and other data processing contracts with national chapters.

We want to expand the network of data protection management in Volt.

And we try to answer questions about data protection to the best of our knowledge and belief.

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Mistale Taylor

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