Global Privacy Principles

BE CLEAR AND TRANSPARENT

BE ACCOUNTABLE

RESPECT THE INDIVIDUAL'S PREFERENCES

VALUE PRIVACY

KEEP PERSONAL DATA SECURE

PROCESS PERSONAL DATA ETHICALLY

TAKE RESPONSIBILITY

GDMA

Global Data and Marketing Alliance

globaldma.com

GDMA
Global Data and Marketing Alliance

PREAMBLE

New technologies and the use of personal data provides humanity with the opportunity to live better, consume better, and be more sustainable. Data has an ever increasing role in this quest for business, innovation, and economic growth. The benefits of data for society and the economy can only be achieved through its ethical use and the generating of trust between individuals and organisations. Privacy and data protection rules both contribute to the creation of trust, while providing a framework for responsible free flows of information across the world.

The GDMA Global Principles establishes a worldwide framework for customer communication that should underpin all legal and commercial approaches. They are designed as an instrument of best practice and they are intended to serve as a guide for self-regulation and legislation.

The GDMA Global Privacy Principles are aspirational commitments for organisations, governments, and people to cultivate a trusted and successful commercial ecosystem through serving each individual with fairness, transparency and respect for privacy. The guiding principle of respecting and valuing privacy engenders trust at the heart of customer communication as an exchange of value between an organisation, looking to prosper, and an individual, looking to benefit. These principles ensure that organisations across the globe put the individual at the heart of everything they do, so that organisations can be trusted, respected and ultimately sustained in all countries.

GDMA
Global Data and Marketing Alliance

PRINCIPLES

VALUE PRIVACY

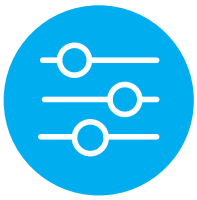
Respecting and valuing individuals' privacy expectations is crucial in generating trust in the entire data and marketing ecosystem. Organisations must help individuals to feel confident and comfortable about marketing practices (for instance – when browsing the web, receiving an email, using a mobile app, or purchase online or offline) in order to generate benefits both for the individuals through trusted communication and for the organisation through worldwide value creation.

- Organisations must make "Privacy" a core value through codes or policies, which must be approved by top management and communicated to all stakeholders.
- Organisations must take steps to ensure employees, partners and suppliers understand and are committed to the organisation's Privacy values.
- Organisations must train and commit employees to respect and value Privacy and ensure data security.
- Organisations should adopt a privacy by design approach.

BE CLEAR AND TRANSPARENT

Organisations must create trust by being clear and transparent with individuals about their personal data collection, use and disclosure practices.

When collecting personal data, organisations must provide (in privacy policies and beyond), timely, easily accessible and clear information about:
- The identity of the organisation.
- What personal data is collected and how they plan to use it.
- The purpose of the personal data processing activities.
- If they plan to share individuals' personal data, to what type of organisation and how.
- The right of the individual to access, rectify, update and suppress their personal data, according to local law, and how the individual can exercise these rights.
- Organisations must be clear about costs and processes that impact individuals.
- The sources of the data when not directly collected from the individual.



RESPECT THE INDIVIDUAL'S PREFERENCES

Organisations must respect individual's preference with regard to the use of their personal data for marketing communications, whenever legally and technically possible, as a way towards more efficient communication, benefiting both individuals and organisations.

- Every marketer must provide an easy way for the individual to express his or her preference with respect to receiving communications from the organisation.
- The organisation must also respect opt-outs mandated by government and self-regulatory initiatives to which they are subject.
- Organisations must ensure individuals have a clear understanding of the preferences they have expressed and of any data processing resulting from their preferences.

GDMA
Global Data and Marketing Alliance

PROCESS PERSONAL DATA ETHICALLY

The proper collection, storage, use and disclosure of personal data is essential to maintaining the integrity of the digital marketing ecosystem. Special care must be taken when dealing with sensitive data.

- Organisations must limit the collection of personal data to what is necessary to fulfil their legitimate purpose.
- Organisations may not use or disclose personal information for purposes superfluous to the reason for which it was collected.
- Organisations should store personal information securely and for only as long as necessary to fulfil the informed purpose.
- Organisations should be particularly diligent when dealing with personal data that may cause harm to individuals if mishandled.
- When collecting personal data from children, organisations must ensure that all the information required is intelligible to the child and is provided by a parent or legal guardian.

TAKE RESPONSIBILITY

Organisations are responsible for the personal data they use to perform marketing activities even when it is transferred or assigned to third parties (processors).

- Organisations must ensure that all their employees involved in personal data and marketing activities respect privacy and data protection practices.
- Every manager in the organisation is responsible for ensuring that personal data are used responsibly in all activities within their area of influence.
- Organisations should regularly conduct internal training on data protection for employees involved in processing personal data.
- Organisations must conduct regular audits of personal data practices and maintain records thereof.
- When commissioning third parties to process data, organisations must ensure that their personal data and marketing activities respect privacy and data protection practices.

GDMA
Global Data and Marketing Alliance

KEEP PERSONAL DATA SECURE

Organisations must implement the necessary technical and procedural safeguards to protect personal data from unauthorised access, modification, misuse, disclosure, or loss.

- Organisations must implement written information security policies and review them periodically, and conduct regular audits and testing of technical systems that house/manage/sort personal information.
- Organisations must restrict access to their systems on a "need to know" basis. Each user should only have access to the personal data which they need to fulfil their tasks.
- Whenever possible, organisations should use encryption and/or pseudonymisation to safeguard the individual's personal data, especially during transfer or storage in a mobile/portable device.
- Organisations should take a Risk-Based Approach when deciding the security measures to implement, ensuring that potentially harmful personal information has higher level of security and further limitations on access.
- Organisation must promptly notify significant security breaches to enforcement or other relevant authorities as well as affected data subjects (when appropriate), and must ensure that personal information is re-secured and protected following a loss or unauthorised access or disclosure.

BE ACCOUNTABLE

The proper collection, storage, use and disclosure of personal data is essential to maintaining the integrity of the digital marketing ecosystem. Special care must be taken when dealing with sensitive data.

- Organisations must limit the collection of personal data to what is necessary to fulfil their legitimate purpose.
- Organisations may not use or disclose personal information for purposes superfluous to the reason for which it was collected.
- Organisations should store personal information securely and for only as long as necessary to fulfil the informed purpose.
- Organisations should be particularly diligent when dealing with personal data that may cause harm to individuals if mishandled.
- When collecting personal data from children, organisations must ensure that all the information required is intelligible to the child and is provided by a parent or legal guardian.

GDMA
Global Data and Marketing Alliance

DEFINITIONS

Encryption: is the process of converting information or data into a code to prevent unauthorised access. This is often applied to any text, messages, data, documents or images and to make the information unreadable to any person and/or organisation that does not have the decryption key.

Individual: refers to the data subject, that is an identifiable natural person who can be identified, directly or indirectly, through reasonable and appropriate efforts, 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.

Organisation: refers to the legal/juristic person, company, partnership, trust, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Organisations may be supported by other organisations which process personal data on their behalf (e.g. cloud services, contact centers, organisation processors outsourcing).

Personal data: means any information relating to an identified or identifiable natural person (individual).

Personal data breach: an infringement of security that leads to the accidental or unlawful destruction, loss, theft, alteration, unauthorised access to or disclosure of personal data.

Personal data processing: any action done with personal data from its collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction through its erasure or destruction.

Privacy by design: is a principle which requires any organisation that is designing a data or marketing product, service or process to think about the privacy implications in advance. Thinking about privacy implications upfront and developing and integrating privacy solutions in the early phases of a project will help the organisation identify and address any potential problems at an early stage.

Privacy policy/ privacy notice: is the clear and comprehensive explanation to individuals about an organisation's data practices, including how it collects, uses, stores and shares data, and the individual's rights to have their data protected and information pertaining to how to proceed if an individual believes that their data have not been protected.

Sensitive personal data: personal data which if released without consent, could cause the individual to be marginalised and/or be harmful to the individual if it is accessed by non-authorised persons. For example: racial or ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs or affiliations. Data relating to minors may also be sensitive.

GDMA

Global Data and Marketing Alliance

globaldma.com
info@globaldma.com