

1. INTRODUCTION

Ocean Risk and Resilience Action Alliance Inc. ("ORRAA Inc.") needs to gather and use certain information about individuals. These individuals may include beneficiaries of ORRAA Inc. programs, employees, candidates for employment, business contacts, suppliers, website visitors, donors, consultants, fellows, volunteers and other people the organization has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

2. PURPOSE

This Data Protection Policy and its related sub-policies and associated procedural guides ensure that ORRAA Inc.:

- complies with data protection laws and follows good practices;
- protects the rights of all individuals whose personal data it gathers and uses;
- is transparent about how it stores and processes individuals' personal data; and
- protects itself from the risk of data breach.

3. **DEFINITIONS**

Personal Data	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, 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.
---------------	--

4. DATA PROTECTION LAWS

U.S. data protection laws, the EU General Data Protection Regulation (GDPR) and other relevant data protection laws and codes of conduct, affect how organizations – including ORRAA Inc.– must collect, handle and store personal information. These laws, regulations and rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with relevant laws, regulations and rules, Personal Data must be collected and used fairly, stored safely and not disclosed unlawfully.

5. DATA PROTECTION PRINCIPLES

ORRAA, Inc. abides by the following important principles. Personal Data collected by ORRAA Inc. must:

- a. Be obtained only for specific, lawful purposes;
- b. Be processed fairly, lawfully and in accordance with the rights of data subjects;
- c. Be adequate, relevant and not excessive;
- d. Be as accurate as practically possible;
- e. Be protected in appropriate, legally compliant ways;
- f. Be retained only for as long as is lawful and necessary; and
- g. Not be transferred outside ORRAA Inc. to any entity unless that entity also ensures an adequate level of protection.

In addition to the above, ORRAA Inc. informs individuals, in a concise, transparent, and

easily accessible manner, using clear and plain language, as to how ORRAA, Inc. handles their Personal Data, and ORRAA Inc. honors data subjects' requests for information about ORRAA Inc.'s processing of Personal Data and for the deletion, restriction of processing or rectification of the same, where required by law or donor regulations.

6. **RISK MITIGATION**

This policy helps to protect ORRAA Inc. from some very real data security risks, including:

- Breaches of confidentiality -- e.g., information being given out inappropriately.
- Failing to offer choice e.g., all individuals should be free to choose how the company uses Personal Data relating to them, including the right to have their Personal Data deleted.
- **Reputational damage** e.g., the company could suffer if hackers successfully gained access to sensitive data.

7. SCOPE

This policy applies to:

- The head office of ORRAA Inc.
- All officers, directors, staff and volunteers of ORRAA Inc.
- All contractors, suppliers and other people working on behalf of ORRAA Inc.

Adherence to the policy is mandatory and non-compliance may lead to disciplinary action.

8. ROLES AND RESPONSIBILITIES

Everyone who works for or with ORRAA Inc. has some responsibility for ensuring that Personal Data is collected, stored and handled appropriately and lawfully.

Any questions regarding this policy and ORRAA Inc.'s data protection practices should be sent by email to <u>info@oceanriskalliance.org</u> or by writing to 2336 Wisconsin Ave NW #32043, Washington DC 20007.

Suspected policy violations may be reported at ethics@oceanriskalliance.org

9. RELATED SUB-POLICIES / STATEMENTS / PROCEDURES

This Data Protection Policy exists alongside and in coordination with the following subpolicies, statements and procedural guides:

- Website Terms of Use
- Privacy Policy
- Cookies Policy