# ISACA Chapter of RI Internal Privacy Policy

Version 3.1 – 30 June 2019

**Scope**

This policy outlines ISACA-RI (“Chapter”) policies with respect to the treatment of the personally identifiable information (PII) of the following individuals:

* Current and past website users and individuals who purchase materials;
* Members (both current and past);
* Event attendees, speakers, sponsors, survey respondents, and other participants in Chapter programs; and
* Non-member volunteers who participate on Chapter projects and/or volunteer groups.

This policy does not describe Chapter policies with respect to personally identifiable information of employees, consultants, contractors, vendors, licensees, sponsors, or advertisers.

This policy applies to handling of personally identifiable information stored in all forms (whether on paper, electronically – including on computer hard drives, CD ROMs, removable flash drives – or otherwise) by Chapter. It does not describe the treatment of information by legally independent entities that may work with Chapter, including ISACA International.

This policy is for internal use by Chapter members, volunteers, employees and by others (such as contractors, vendors, and the like) who have access during their duties for Chapter to PII (as defined below) maintained by or on behalf of Chapter.

**Responsibility and Accountability**

**Bylaws and Standards committee** is responsible for Chapter’s privacy program. The responsibilities include periodical review and update of the policy, responding to those who wish to access their information.

**Notice**

Chapter provides notice about its policies and practices relating to personally identifiable information and identifies the purposes for which information is collected, used, stored shared, and secured. Chapter’s notice program includes the following elements:

* When feasible (and/or legally required) Chapter provides notice to individuals before their personally identifiable information is collected.
* Chapter provides notice and obtains consent (as legally required) before information it maintains is used for a purpose that is either unrelated to the purpose for which the information was originally provided, or that is for a purpose that was not disclosed in the original notice to the individual.
* Chapter provides external notice about its privacy practices on its website. The notice describes how personally identifiable information is collected, used, stored, and shared, and secured.
* Chapter provides notice in its various printed information collection forms about how personally identifiable information will be used.
* Chapter also provides notice in situations other than traditional online or offline information collection, such as when people are taking surveys or attending meetings (including event sign-in sheets) and instructs its employees about when notice must be provided.
* This Internal Privacy Policy is used to inform Chapter personnel (and others, such as volunteers, contractors, etc., who will access personally identifiable information maintained by Chapter and who have a responsibility to adhere to this policy) about Chapter’s responsibilities with respect to use of personally identifiable information, and is distributed to personnel along with the external privacy notice

**Collection**

Chapter currently collects the following types of personally identifiable information (for the purposes described in the “use” section of this policy). The Chapter collects information in a variety of ways, including registration to training sessions and events organized by the chapter.

In the online environment, Chapter uses some common passive data collection mechanisms, including cookies. Chapter uses fair and lawful means to collect information. It is Chapter’s policy not to develop or acquire additional information about those individuals whose personal information is covered by this policy, unless it has obtained consent from those individuals.

**Choice and Consent**

To the extent feasible – keeping in mind Chapter’s legal obligations, business goals and resources – Chapter gives individuals choice about how their information will be used. This choice includes, for example, seeking consent and/or providing clear notice about use of personally identifiable information.

Chapter informs individuals what choices they have about how information will be used, stored, or shared with third parties.

**Use**

Chapter uses personally identifiable information it obtains for the following purposes:

* Those purposes described in Chapter’s external privacy policy, and as described at the time it collects information
* To process individuals’ requests;
* To publish on the chapter website the names, titles, and business affiliations of officers, committee members and others who have assisted with initiatives or projects;
* For other legitimate business purposes of Chapter that are permitted by applicable laws, rules and regulations, and/or that are in keeping with appropriate industry guidelines and practices.

**Sharing**

Chapter shares personally identifiable information with third parties only for legitimate business purposes and as permitted by applicable law, rules and regulations. Instances when Chapter may share information include:

* To the IT Governance Institute, ISACA Headquarters, and from time to time volunteers (such as ISACA board members) performing tasks on Chapter’s behalf;
* In anticipation of and during an actual or potential sale, reorganization;
* When Chapter believes it is necessary to cooperate with law enforcement or in response to a government request.

Individuals are notified of Chapter’s practices with respect to the sharing of information with third parties in Chapter’s external privacy policy, accessible on the Chapter website.

When sharing information, Chapter limits the amount and type of information shared to that which the other party needs or that is relevant to the other party.

If Chapter shares personally identifiable information with a vendor or other third-party providing services on Chapter’s behalf, Chapter requires that the third party use the data as directed by Chapter and that it maintains the confidentiality and security of the data.

Chapter will take appropriate remedial actions if it becomes aware of any situation in which a third-party misuses personally identifiable information.

**Access**

Those who wish to access their information or have their information updated are directed in Chapter’s external privacy policy to contact Chapter by email, regular mail, or phone. Such requests will be answered and addressed under the direction and supervision of chapter designee responsible for the Chapter privacy program.

**Completeness and Accuracy**

Chapter relies on individuals to provide it with complete and accurate personally identifiable information, and in certain circumstances may require individuals to represent and warrant that the details they have provided are their own, are complete, and are accurate.

**Retention and Disposal**

Chapter’s current policy is to retain information for so long as it is needed by the business. Since most information is in continuous use, much is retained on an indefinite basis.

When Chapter finds that it has extensive information it is not using, it will determine appropriate means to dispose of personally identifiable information in a secure manner in keeping with its legal obligations.

**For all privacy comments or concerns please reach out to the ISACA-RI president -** [**president@isaca-ri.org**](mailto:president@isaca-ri.org)