

Helsinki España Policies





Data Protection Policy

1. Purpose

Helsinki España is committed to protecting the privacy and personal data of all individuals whose information we collect and process in the course of our activities. This policy outlines how we manage, store, and protect personal data in compliance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and applicable Spanish legislation.

2. Scope

This policy applies to all staff, trainers, volunteers, interns, consultants, and external collaborators who process or have access to personal data on behalf of Helsinki España. It covers all data collected during training activities, project implementation, recruitment, event organization, or any other operational process.

3. Types of Personal Data Collected

In the context of our educational and humanitarian work, Helsinki España may collect and process the following categories of personal data:

- Full name, contact information, date of birth, and nationality
- Passport or ID details (for training registrations or travel)
- Medical information and health-related data (when relevant for training safety)
- Academic history and qualifications
- CVs, professional profiles, and employment history
- Photographs and video recordings (for documentation or communication purposes)
- Evaluations, feedback, and personal reflections from participants
- Interview notes and selection-related assessments for course applicants
- Psychological notes, when applicable and always with informed consent



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4. Legal Basis for Processing

We process personal data only when one or more of the following legal bases apply:

- The data subject has given explicit consent
- Processing is necessary for the performance of a contract or participation in an activity
- Processing is required to comply with a legal obligation
- Processing is necessary to protect the vital interests of the individual or others
- Processing is necessary for the legitimate interests pursued by Helsinki España, in accordance with GDPR

5. Data Protection Principles

Helsinki España adheres to the following data protection principles:

- Lawfulness, fairness, and transparency: We inform individuals clearly about how their data will be used.
- Purpose limitation: Data is collected for specific, explicit, and legitimate purposes.
- Data minimization: We collect only the data that is necessary for the purpose.
- Accuracy: We keep data accurate and up to date.
- Storage limitation: Data is retained only for as long as necessary.
- Integrity and confidentiality: We apply technical and organizational measures to ensure data security.
- Accountability: We can demonstrate compliance with these principles.



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6. Data Storage and Security

- All digital data is stored on password-protected and access-controlled systems.
- Sensitive data (e.g., medical information or psychological notes) is stored with restricted access.
- Paper records are kept in locked cabinets in secured offices.
- When using third-party tools (e.g., cloud storage, registration platforms), we ensure they comply with GDPR standards.
- Photographic or video material is only used with prior written consent.

7. Data Subject Rights

In accordance with GDPR, all data subjects have the right to:

- Access their personal data
- Request correction or deletion
- Restrict or object to processing
- Withdraw consent at any time
- Lodge a complaint with the relevant data protection authority (AEPD in Spain)

Requests related to data protection can be sent to:

helsinkiespana@helsinkiespana.org

8. Special Considerations for Psychological Support and Sensitive Data

When psychological or emotional support is provided during our programs, any notes or data related to participants are treated with strict confidentiality. This data is:

- Collected only with informed, written consent
- Stored securely and accessed only by authorized personnel
- Never shared without explicit permission from the data subject



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9. Third Parties and International Transfers

Helsinki España ensures that any third parties (e.g., contractors, platforms, or partners) with access to personal data are contractually obligated to comply with data protection standards. Personal data is not transferred outside the EU unless adequate safeguards are in place.

10. Breach Notification

In the event of a personal data breach, Helsinki España will follow its internal incident response procedures and notify the relevant supervisory authority (Agencia Española de Protección de Datos) within 72 hours if required.

11. Review and Updates

This policy is reviewed annually or whenever there is a significant change in our data processing activities or in applicable legislation.



María Jaén Barandiarán
President
Helsinki España