

GDPR

for

Rotary Semda



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1. GDPR – Introduction

This documentation describes the work and rules for implementing the new regulation, GDPR, **General Data Protection Regulation**, to be set as EU law on May25 2018.

BACKGROUND

In order to ensure a consistent and high level of protection of natural persons and to remove the obstacles to flows of personal data within the Union, the level of protection should be equivalent in all Member States. Recital 11 elaborates the fact that an equivalent level of protection of personal data throughout the Union requires, amongst others, “equivalent powers for monitoring and ensuring compliance with the rules for the protection of personal data and equivalent sanctions for infringements in the Member States.”.

Furthermore, equivalent sanctions in all Member States as well as effective cooperation between supervisory authorities of different Member States is seen as a way “to prevent divergences hampering the free movement of personal data within the internal market

2. GDPR for Semda - Rotary

Definitions

Main organization is **Rotary International**, Illinois, USA.

A **Rotary member** is member in a **Rotary Club**.

The **Rotary Club** is member in **Rotary International**

Member Manage System, **MMS**, is a local database in a country or in a Rotary district or a group of districts (Multi-district).

SEMDA is a software package for transport of data from **MMS** to **Rotary International**

The purpose with SEMDA is:

Clubs all over the world is forced to maintain Rotary Internationals member database. In order to simplify and maintain high data quality, Semda transfer club- and member data from local databases in countries and/or districts to Rotary International.

Semda acts only against MMS on district or Country(Multi-district) level.

Districts

A district is a group of 40-60 clubs. Districts has a number like 2320, 2330 a.s.o.

District can cover clubs over country borders. A District has no member database but has data about officers in the district.

Clubs

A Rotary Club is a member association and these can be active members as well as honorary members. The club has a number and name, such as 13000 Rotary Club of Stockholm.

Each member has a unique ID number, also called RI number (member-ID).

Each club is responsible for its part of the common database. Each club is also responsible for the club's website or sites on other social media.

Important:

A club must do an active choice to select if the club shall participate in data integration or not. If the club hasn't select Semda, no club- or member data is stored in Semda or transferred to RI.

3. Definitions

Data Controller (DC)

A Data Controller is in Rotary the Club. The Club owns and are responsible for the database.

The club is also responsible against EU Directive to collect consent or other approval according to Article 6(1)-f in the Directive.

If the club uses a vendor for the MMS, the club shall have an agreement with the vendor with insurance that the vendor is compliant with GDPR.

Responsibility:

- The club is responsible, if it uses common MMS, that agreements are set up and maintained against the vendor.
- The club is responsible that consent or other approval from members is collected. **Legitimate interest** according to Article 6(1)-f is recommended.
- The club is responsible for collected consents or other approval are stored and can be presented at a revision.
- The club is responsible for keeping members up to date on the rules governing the storage and deletion of personal data.

Data Processor (DP)

Data Processors are normally the vendor who run and maintain the MMS, such as a service provider or web host. The Data Processor can assign Sub-Processors for handling persona data.

Data Processors are the company who processes personal data for the personal data controller, such as a service provider or web host. A personal information assistant is always outside of your own organization.

Semda is normally a Sub-Data Processor and act on the behalf of the MMS to transfer personal data to Rotary International.

Responsibility:

DP is responsible for the clubs that all processing of personal data is in accordance with the GDPR and / or other country legislation, as well as in accordance with the main agreement with the club. If an agreement is missing, DP may not process any member's personal data in the affected club.

- DP is responsible for signing and maintaining agreements between DP and the clubs.
- DP is responsible for signing and maintaining agreements between DP and the subcontractors.
- DP is responsible for contracts signed between subcontractors and their subcontractors are in accordance with the principal agreements with clubs and that they are in accordance with the GDPR and / or other country legislation.
- DP is responsible for contracts signed between subcontractors and their subcontractors are in accordance with the principal agreements with clubs and that they are in accordance with the GDPR and / or other country legislation.

4. Database in Semda

Data tables in Semda database

Members

CheckSum Uniqueld ClubNo District MembNo (Member-ID) NameFamily NameMiddel NameFirst Address1 Address2 Address3 PostCode City CountryCode DateOfBirth Gender Title BadgeName Member Type	SpouseName EnterDate ExitDate ExitReason PhoneHome PhoneBusiness CellPhone Fax Emailbusiness Emailpersonal WebSite LastOrgNo LastOrgExitDate Magazine SponsorId1 SponsorId2 Classification Language
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Clubs

District ClubNo ClubName Approved MeetDay MeetTime MeetPlace address1 address2 address3 postCode city country countrycode	Office address1 Office address2 Office address3 Office postCode Office city Office country email webSite language
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For each club, some club officers are also transferred. For each Officer, member number, start date and end date are transferred

Officers:

President Incoming President Secretary Incoming Secretary Treasurer Incoming Treasurer Executive Secretary Incoming Executive Secretary	Membership Chair Incoming Membership Chair Rotary Foundation Chair Incoming Rotary Foundation Chair IT-coordinator Incoming IT-coordinator
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5. Unstructured data

Email handling

Semda sends email to Members, Clubs and Club Officers with copy to the local Semda administrator.

None of these emails is stored in Semda. Semda contain neither any other personal information

6. Consent

Semda does not contain any procedure for member consent as it is a system with no user interface.

Therefore, consent, or other approval according to Article 6(1)-f in the Directive, must be handled by the **DC/DP** in each country/district.

7. Right to be informed

Semda does not contain any procedure for informing members about personal data as it is a system with no user interface.

Semda contain NOT more data than the **MMS** sends to Semda, mostly less data.

Therefore, information to members must be handled by the **DC/DP** in each country/district.

8. Logging and erasure of data

Logging

Semda are logging following:

- Every entry to the Server RDP and therefore also entry to Semda
- Every routine started in Semda
- Every Update to shadow database
- Every update to Rotary Internationals **netForum**
- Every error messages
- Every sent email (not content od the emails)

Erasure

When a Termination of a member has successfully been performed, all personal data for the member is deleted immediately. No historic data is saved.

9. Transfer of data to Rotary International

Existing transfers

To Rotary International, the transfer via the Semda system, provided by Semda AB.

Semda AB provides this transfer solution to currently 11 countries, one of which is outside of Europe.

Description of the Semda transfer

The transfer is of so-called off-line transfer. The local database, **MMS**, system contains web services that Semda calls every night. **MMS** responds to the call by sending three XML files to Semda. The files contain **Member Information**, **Club Information**, and **Officer Information**.

Semda does not contain any interface to clubs or members. Only a designated Semda administrator can access Semda's routines and shadow database via **Remote Desktop**.

Semda, update step 1

In Semda there is a shadow database table for the three parts. When XML is received, these tables are updated. Each data item that has changed information since the previous run is marked as CHANGE.

Semda, update step 2

Semda reads the three registries and for each data item flagged as CHANGE, Semda performs a transfer to Rotary International's **netForum** database. Updates may be CHANGE, NEW or DELETE.

The update routine also contains a number of email routines. In case there are validation issues or other issues that prevent **netForum** update, Semda can send email to members, club officers, Semda administrator and to Rotary International (data@rotary.org).

For update type NEW, i.e. New member, Semda perform an Insert in **netForum**. As a return for approved updates, Semda receives the membership number (Member-ID) that applies to all databases. This member-ID then sends Semda back to **MMS** via its own Web service.

When updating the DELETE type, the member is completely deleted in Semda's shadow database.

Semda, other features

Semda contains a number of procedures that can be initiated by the Semda Administrator:

- Validation of member and club information
- Search routines in RI's netForum
- Comparison routines for club members, between netForum and ClubAdmin
- E-mail functionality for clubs and members.

10. Risk assessments of stored data

Semda has no interface for regular users. Only assigned persons (normally one per installation) can access Semda via RDP, Remote Desktop Processing. All accesses are logged.

The risk that personal information will be altered improperly is therefore very low. If this happens, the information will be restored at the next loading of the XML files the following night.

Risk of data loss

All data in Semda comes from XML files from MMS at every night's run. If data were lost in Semda, this will be restored the next night.

The internal database together with the received XML files is backed up every night and saved for six months.