

## Keeping tabs on your data

February 2004

In the past, administration for HEDNA membership enrolments and renewals has been divided between DISA - our Association management company based in Virginia, USA - and Gocomms in the United Kingdom, which supports the work of HEDNA EMEA. These processes will now be handled exclusively by DISA and as a result, we must consolidate HEDNA's databases.

The European Union has legislation in place to protect individuals over the processing of personal data, and to limit the free movement of such data. So, according to EU Data Protection Directive 95/46/EC, HEDNA must first secure permission from its members to transfer data to DISA.

Article 25 of the Directive states: "The transfer to a third country of personal data may take place only if the third country in question ensures an adequate level of protection". HEDNA commits to uphold the principles of the directive:

- **The purpose limitation principle** - data should be processed for a specific purpose and subsequently used or further communicated only insofar as this is not incompatible with the purpose of the transfer.
- **The data quality and proportionality principle** - requires that data integrity be maintained, i.e. data should be accurate and where necessary, kept up-to-date. The data should be adequate, relevant and not excessive in relation to the purposes for which they are transferred or further processed.
- **The transparency principle** - individuals should be provided with information as to the purpose of the processing and the identity of the data controller in the third country, and other information insofar as this is necessary to ensure fairness.
- **The security principle** - the storing of data must be done by a controller with technical and organisational security measures that are appropriate to the risks presented by the processing.
- **The rights of access, rectification and opposition** - the individual should have a right to obtain a copy of all data relating to him/her that are processed, and a right to the rectification of those data where they are shown to be inaccurate. In certain situations, he/she should also be able to object to the processing of data relating to him/her.
- **Restrictions on onward transfers** - linking heavily to trans-border data flow, this principle requires that further transfers of personal data by the recipient of the original data transfer should be permitted only where the second recipient is also subject to the rules of adequate protection.

E-mails requesting approval for the transfer of data are being sent to all primary and secondary contacts for HEDNA members headquartered within EMEA. If you have received one of these e-mails and have not yet replied, please sign and fax back the form confirming that your membership information can be retained with DISA, so that we can keep you advised of the full range of HEDNA services and news.

If you have not yet received an e-mail, or you would like further details, please contact [info@hedna-emea.org](mailto:info@hedna-emea.org).

Please be assured that we will always respect your right to privacy. Your membership details will be retained by HEDNA and DISA and will not be disclosed, shared with or sold to any other parties.