

DATA PROTECTION POLICY

Context and Overview

Policy prepared by: **BreachBuilders e.V.**

Approved by Board Management: 27.06.2025

Policy became operational on: 01.07.2025

Introduction

This policy explains how BreachBuilders e.V. collects, processes, and protects personal and research data, in compliance with the **General Data Protection Regulation of 25 May 2018** (GDPR) and Germany's **Federal Data Protection Act of 30 June 2017** (BDSG).

This data protection policy ensures BreachBuilders e.V.:

- Complies with data protection law and follows good practice
- Protect the rights of staff, individuals and partners
- Is open about how it stores and processes individuals' data
- Protect itself from the risks of a data breach

Data Protection law

The Data Protection Law Act 2017 outlines the requirements for public and private bodies, including BreachBuilders e.V., to collect, handle, and store personal and research data. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, data must be collected and used fairly, stored safely and not disclosed unlawfully. The Data Protection Act is therefore underpinned by 8 principles, according to § 3 of the BDSG & Art. 5(1)(a) of GDPR:

1. **Lawfulness, Fairness & Transparency:** Be processed fairly and lawfully
2. **Purpose Limitation:** Be obtained only for specific, lawful purposes
3. **Data Minimisation:** Be adequate, relevant and not excessive
4. **Accuracy:** Be accurate and keep up to date
5. **Storage Limitation:** Not held longer than necessary
6. **Integrity & Confidentiality:** process in accordance with the rights of data subjects
7. **Accountability:** Be protected in appropriate ways
8. **International Transfer Restrictions:** Data cannot be transferred outside of the European Economic Area, unless the country or territory also ensures an adequate level of protection.

Part 1: General Data Privacy: *(BDSG applies to non-public bodies, §§ 1–11, 27–38a)*

1. Legal Basis & Principle of Legality

We collect, process, and use personal data (pictures, names, socio-demographics) only when explicitly permitted, either by BDSG § 4 (1) or via your consent, in line with the “prohibition with reservation of permission” principle.

2. Data Collection & Purpose Limitation

Data are collected directly from you via website, surveys, events, interviews or in-person forms (BDSG § 4 III). We use data solely for event management, communication, reporting, and internal program evaluation. No repurposing without separate consent.

3. Data Minimisation & Transparency

In accordance with § 3a and § 4 of BDSG, we collect only data that's strictly necessary “*data economy*” and inform you clearly about why and how it’s used.

4. Storage & Access

All data is stored encrypted in our cloud system. Access is strictly limited to authorised staff. We treat photographs as personal data, with safeguards in accordance with § 4 (III) and § 6 (I) of the BDSG.

5. Cookies & Tracking

We use analytics cookies that do **not** collect personal information. Cookie deployment is for anonymous usage statistics and complies with BDSG's proportionality and transparency principles (§ 4, § 6)

6. Data Sharing & Transfers

We do **not** share personal data with third parties. Transfers outside the EU are not practised. If necessary, they would comply with §§ 4b and 4c of BDSG (adequacy safeguard or explicit consent).

7. Your Rights

You have rights under BDSG & GDPR to:

- Access (§ 34 BDSG)
- Rectify or delete (§ 35–37)
- Object or restrict processing (§ 38)
- Withdraw consent anytime
- You may also lodge complaints with the German data protection authority.

Part 2: Research Data Privacy & Ethics : *(BDSG § 30a for research, and § 1 -11, 27–38a)*

1. Ethical Principles

All research is conducted in accordance with voluntary informed consent. We adhere to the protection of fundamental rights (§ 1 BDSG) and transparency (§ 4) as outlined in the Data Protection Act.

2. Scope & Data Types

Research data may include, but is not limited to, anonymised survey responses, interviews, transcripts, and focus group notes. All personally identifiable information is removed before analysis.

3. Anonymisation & Pseudonymization

In line with § 3a and § 6, we use anonymisation schemas so that individuals cannot be identified. Only aggregated, non-identifiable averages or statistics are reported.

4. Use, Storage, and Access

Data are securely stored with access limited to the research team. We do **not** share research data with third parties; if future sharing arises, it will require your explicit consent.

5. Participant Rights

You may:

- Withdraw your data at any point before anonymisation
- Request a copy of your anonymised data
- Report concerns to our Head of Research

Contact & Complaints

For questions about data protection or to assert any rights, contact: contact@breachbuilders.org

