

## **DSRA PRIVACY POLICY**

### **1. Policy Statement**

It shall be the policy of the Delphi Salaried Retirees Association [DSRA] to assure that all information supplied to DSRA by its membership in the form of personal contact information, work history, financial contributions, personal stories, etc. shall be treated as confidential and shall not be used or shared outside of DSRA without express permission of the DSRA Member. Also, the use of this information within DSRA shall be in a controlled manner and only in the best interests of the DSRA membership as a whole.

### **2. Purpose**

The purpose of the DSRA Privacy Policy is to protect DSRA Members from exposure and use of their personal data by either external organizations or individuals for unintended use or by DSRA leaders or their designees for a use which is not in the best interest of the entire DSRA membership and which could jeopardize the privacy, security, and financial interests of the individual Member.

### **3. Scope**

The primary scope of this Privacy Policy is to focus on the use of DSRA Member information internally within the DSRA organization. However, this policy shall require that data be protected from unintended access by outside organizations and individuals by providing security of the data stored on the DSRA web site by using technologically accepted practices. These practices shall be posted on the web site in a manner which can be accessed by all users of the web site.

### **4. Definition**

The terms, confidentiality and privacy, shall be used interchangeably in this document and other DSRA documents to mean protection from unintended review or use by any unauthorized personnel either external or internal to the DSRA organization and not expressly permitted by the DSRA Member.

### **5. Application of Policy**

As required by the DSRA Bylaws, DSRA members have the right to expect that personal data transmitted to DSRA either electronically, hand written, verbally, or in any other manner shall be treated confidentially and not intentionally shared outside of DSRA or used internally within DSRA for purposes other than in the best interests of DSRA as a whole.

To protect DSRA Members from personal data being stolen, viewed, or used by external organizations or individuals, DSRA shall use all reasonable technologically available security measures which shall be posted on the DSRA web site for all users to view.

To protect DSRA Members from personal data being viewed and used by DSRA Members for purposes other than those in the best interests of DSRA, the DSRA Board, specifically the DSRA Secretary and Treasurer, shall control and monitor who has access to the data and how the data is being used to assure the confidentiality of the information.

## 6. Types of Information

All types of information that comes under the umbrella of this Privacy Policy is data that was originally supplied to DSRA by the Member voluntarily. DSRA does not employ any practices to gain information about the Members from any other sources or without the Members' knowledge.

When enrolling in DSRA on the DSRA web site, the Member supplies personal contact information including phone numbers, home address, and e-mail address. The Member is also asked to supply age and Delphi work history related information.

Some basic financial information is received associated with contributions made by Members either by check or credit card. Another example of financial data collected is in the form of pension reduction data.

Other information is collected from Members through surveys such as pledge surveys and through election proceedings all of which are voluntary on the part of the membership. Also, sometimes DSRA may request personal hardship stories from its membership to use in its legal and political battles for the good of the entire DSRA membership.

## 7. Use of Information

It is the responsibility of DSRA to use information provided by its membership for the intent in which it was collected. For instance, contact information is used internally by DSRA to routinely contact its membership for such purposes as: providing updates on its progress towards pension restoration; conducting surveys; holding elections, and other purposes related to Delphi retirees' benefits.

Sometimes personal data is summarized and used collectively [without traceability to individual Members] to provide information to external organizations to further the legal and political causes of DSRA.

Individual personal data such as hardship stories are only shared either internally or externally to DSRA with the consent of the member supplying the information.

No personal information, financial or otherwise, shall be used by DSRA in a manner which would result in personal harm, financial or otherwise, to the individual member.

## 8. Information Control Methods

It shall be the duty of the DSRA Board to assure that all personal DSRA member information is protected from exposure and misuse either externally or internally to the DSRA organization. As needed, the DSRA Board may maintain a table of at least: the types of information collected; the location of the data; back up methods for the data; responsibilities for maintaining, analyzing and using the data; security measures in place for the data; and distribution limitations for the data.

### External Sharing

In order to assure that electronic data entered on the DSRA web site by individual members is not exposed to unauthorized external organizations or individuals, DSRA shall incorporate all reasonable technologically available security measures to protect this information. A link to these security measures shall be posted on the DSRA web site for all users to view.

Information which is intentionally summarized for use outside of DSRA to promote its legal and political battles shall be reviewed by the DSRA Board to assure that no data is traceable back to individual members and is in the best interests of the DSRA membership as a whole.

Personal information such as hardship cases shall only be shared with outside resources with the express written consent of the Member that supplied the information.

No personal data shall be sold or intentionally disclosed to outside organizations for marketing purposes.

#### **Internal Sharing – Daily Ongoing Usage**

Control over the internal intended use of general DSRA Member information shall fall directly under the responsibility of the DSRA Secretary and under the DSRA Treasurer for DSRA Member financial information. The manner in which the control of this confidential information is exercised shall be defined in Job Instructions or Statements of Work developed and maintained by the DSRA Secretary and Treasurer.

#### **Internal Sharing – Special Projects**

Determination of an internal need for the use of DSRA Member data such as: an e-blast update to the DSRA membership; a survey for pledge contributions; an election process; a summarization of data for promoting specific legal or political issues, or other similar endeavors shall require approval by the DSRA Board. A specific DSRA Board Member shall then be assigned to oversee the project and may designate individual DSRA members, or a DSRA Committee to carry out the necessary tasks required to fulfill the project objectives.

Depending upon the nature of the project and the type of membership information to be accessed and in order to maintain the privacy of that information, the overseeing Board Member may need to develop and maintain as records specific confidentiality agreements which are reviewed with and agreed to by the assigned individuals.

DSRA Members have the right to expect that the DSRA Board shall exercise “due care” in the security and use of personal member information.

### **9. Record Keeping**

It shall be the responsibility of the DSRA Secretary, Treasurer, or Board Member assigned to oversee special projects requiring the use of confidential membership information to maintain as records: all membership information; any subsequent data that they may have summarized, tabulated or otherwise analyzed from the raw data; and any Job Instructions, Statements of Work, or Confidentiality Agreements generated in the course of assuring the privacy of membership information.

### **10. References**

DSRA Bylaws

DSRA Web site Privacy Statement

## 11. Change History Log

REV	APPROVED	DESCRIPTION OF CHANGE
000	5/26/2011	Initial Application for DSRAPOL 004
001	7/21/2011	Delphi Salaried Retirees Association name updated.
002	1/19/2012	Update web site references to current state; added references to related working documents maintained by DSRA Board /Officers.