



GDPR FAQ – Local & Virtual Group Leaders

What is the GDPR?

The General Data Protection Regulation is regulation created by the EU on data protection and privacy for all individuals within the European Union.

Why do I need to know about the GDPR?

While the GDPR is an EU regulation, it applies to any organization or event that has any EU citizen's data. Even Local Group meetings happening outside of the EU often have EU speakers or visiting EU attendees. In order to ensure Group Leaders that may be processing data of EU citizens are adhering to the principles and best practices of the GDPR, we are applying the standards of the GDPR to all PASS Local and Virtual Groups.

What does "Processing" mean?

Processing is defined by the GDPR as: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. For Virtual Groups and Local Groups using PASS owned portals, PASS is considered a Controller, and a Processor. PASS is a Processor because data is stored and accessed using the online admin tools created by PASS. As an Organizer, you are also considered a Processor, as you act upon the data that is collected through the PASS Group portal.

What does "Controller" mean?

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of personal data. This is PASS. PASS controls and maintains the online admin tools that are granted to Group Leaders and outlines how the data collected can be used, i.e., emailing Registrants about the event. Controllers are responsible for, and must be able to demonstrate compliance with the GDPR.

If PASS is responsible for compliance with GDPR, do Group Leaders have any obligations to maintain GDPR compliance?

The short answer is, yes. The GDPR does outline obligations that Processors have in maintaining data privacy and protection of any data that they process. If Processors breach these obligations, they could be held liable for compensation.

What are these obligations that Group Leaders need to comply with?

The obligations that Group Leaders are under are outlined in the PASS Local and Virtual Group Agreements and Data Protection Policy for Group Leaders. The key points are:

- Group Leaders will only process data as outlined by PASS
- Group Leaders will not engage other Processors (third parties) without the express consent of PASS. Express consent means Processors must obtain a written statement of consent by PASS.
- Group Leaders and anyone they authorize to process the personal data of Registrants must be committed to confidentiality
- Group Leaders must report any breach of personal data as soon as they become aware of it, in order to work with the Controller (PASS) to appropriately report the data breach.

Can I expect changes to the PASS Group Dashboard?

We have been making some updates to the PASS Group Dashboard to ensure ongoing GDPR compliance: Some of the recent updates include:

- Removed the ability to manually upload contacts in the PASS Group Dashboard and to message contacts that were manually uploaded previously
- Updated the [Privacy Policy](#) and [Terms of Use](#)
- Added a cookie pop-up notification to allow visitors to the PASS.org site to set their own preferences
- Updated the language from "join" to "subscribe" to a Local or Virtual Group, to clarify the consent to receive communication

Compliance is an ongoing effort and if at any time PASS feels like a tool or function needs to be restricted or removed to ensure compliance, we will do so. We will do our best to communicate any changes in advance to ensure minimal disruption to the organization of your event.

What if someone at my Group meeting asks to be added to my Group or my email list?

If someone asks to be added to your Group or to your email list, you must have them subscribe to the Group online, on the [PASS Local Groups page](#). This is required to obtain and store a proper record of their consent for you to message them through the platform, and is the best way to achieve compliance in messaging your Group Members.

What if someone emails me, or comes up to me at my Group meeting and asks to be erased or to have the right to be forgotten?

If someone contacts you and requests to have their data erased, please email governance@pass.org. PASS will assist Group Leaders with ensuring the individual's data is erased from the database, after first taking reasonable steps to confirm the identity of the person making the request. PASS will ensure that the personal data of the individual making the request is no longer processed using the PASS Group portal tools.

If PASS is unable to delete Customer Data for technical reasons, PASS will apply measures to ensure that Customer Data is blocked from any further Processing. You are solely responsible to protect the privacy of any data in your possession that you have collected and processed from the PASS website. As an Organizer and Processor, if you breach these obligations, you could be held liable for compensation.

What if I don't use the PASS website to host my Local Group website?

PASS is the Controller for PASS owned portals and PASS Member data. Any alternate used for Local Groups is the responsibility of Local Group Leaders.