

Policy for collection and processing of data in Kompasset

(regarding service users)

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1. Kompasset's collection of data

Kompasset collects and processes personal data and therefore must respect the legislation and the principles for good data processing ethics. Therefore, we have implemented the following policy for processing of data, that tells how we process personal information of users of our services, that ensures a legal and transparent processing.

The organization processes only information used for clear and professional purposes, and out of legitimate interests. We delete information when it is no longer needed or if someone asks us explicitly to do so.

The collection of this data has two main purposes:

- Firstly, we need to document how many users visit Kompasset, where they come from, their age, what problems they are facing etc. This is done in order to conduct rights-based work, on behalf of the users and with the authorities, politicians etc.; to ensure continuous optimization of our services according to our users' needs (e.g. need for counsellors with specific language competencies, need for more sleeping places) as well as to satisfy documentation needs upon application for funding.
- Secondly, we keep journals on those users who receive counselling in order to ensure quality and continuity of counselling.

The collection and registration of data is divided into two parts: stamkort (all the users) and journals (for those who receive counselling).

The primary information collected and registered on stamkort is:

- Date of registration (usually – but not necessarily – the date when the person first visited Kompasset)
- Name and surname or alias. For us in Kompasset, it is to some extent irrelevant if the person chooses to use their real name or an alias, as long as we can recognize the user in the journaling system.
- Gender
- Nationality
- Residency permit if the person chooses to disclose one.
- Year of birth
- The person's sleeping situation (shelter, outside, tent, with friends and family etc)
- Optional: handicap
- Where they have heard about us

In the journal, we register what kind of help the person has asked for and how we have met that request. In the text, it is described shortly in English or Danish (though preferably in English so that it is easily accessible by anyone who might be involved in the case), after which it is marked one or

more of the categories relevant to what the case is about. The next worker who has something to do with that specific person or case, can in this way easily get an update about the status of the case.

Most often we receive this information from the person seeking assistance themselves and we register it upon consent (see chapter 3). In certain cases can we receive this information from other parties (authorities, hospitals, other organizations) if the person has consented that we receive this information.

2. Consent

Consent must be given voluntarily, specifically, informed and unequivocally. Consent can be taken back at all times and information therefore deleted. If these requirements are not fulfilled, we cannot register data on the specific user. For Kompassets staff and users this means that:

- Our assistance for a user of our services is not dependent upon consent for registration. Therefore, we aim to be attentive over when and how we ask for consent to collect data and register. It must not be interpreted as a prerequisite for getting help or using our facilities. Registration is not a requirement but something we want to do to ensure the quality of work and follow-up.
- As a user of our service, you can at any time withdraw consent, which will also trigger a deletion of the registered data.
- Consent given for collection of information from third parties, regarding a specific case, is not valid consent for registration in our system.
- We ensure seek to ensure that the user has explicitly and clearly indicated or confirmed that he/she gives consent for registering. There cannot be any indication of doubt. Kompasset bears the obligation of proof of valid consent. This means that we must be able to prove that the user has given consent for the registration and processing of their data. In this context, written consent will always be preferable. However, Kompasset's staff has jointly decided that in connection with registration, we will not ask for written consent, but instead work with oral unambiguous consent, which is given and registered as the first item on the stamkort.

3. Forwarding of your information to third parties

We do not forward information to third parties unless it is with consent from the user of the service and for the specific purpose of assisting with a concrete issue. Our offer is confidential and anonymous.

4. Data processor vs. Data controller and safe mail

In Kompasset we have chosen DanJournal (DJ) as our Data Processor. Kompasset is a Data Controller. DanJournal is approved for the secure storage of our data, but data security is also our responsibility. For example, it is our responsibility how we write journals and how we manage DanJournal. We must also ensure that resigned employees and volunteers do not have access to DanJournal. It is the responsibility of the Data Controller to delete profiles that are no longer used. We ensure to close access for staff and volunteers who have stopped volunteering with us.

Stamkort that is filled in on paper, handwritten notes from the counselling, etc. are shredded immediately after they have been introduced in the electronic system (DJ).

Other documents in physical form, including personal information must be kept locked.

Electronic documents with users' names (e.g. CVs or similar) must be uploaded to DanJournal and deleted permanently from Kompasset's computers.

Sensitive personal information can be shared internally in the organization (from @kirkenskorshaer.dk mail to @kirkenskorshaer.dk mail) securely. Mails that are sent to external actors, e.g. emails that contain personal sensitive information that is to be shared with authorities (police, authorities, commune, hospitals) or other relevant stakeholders, is sent out with **sikkermail**. Sikkermail is an extension that encrypts e-mail from both ends. The Extension is installed by Kirkens Korshær's IT Support team. Contact support@kirkenskorshær.dk for questions or ordering of sikker mail.

5. Anonymising of data and deletion – latest 2 years after the last contact

The user's stamkort and associated data are anonymized when there is no longer relevance for Kompasset to keep it. The current registration system, in many cases, doesn't allow us to see when the last contact with a person has happened. This is because we only register when the person visits us the first time and thereafter only if the person returns with a specific counselling item. Moreover, we experience that many users return and their cases are "re-opened". **We have therefore decided that we anonymize data latest 2 years after the last registered note was made**, unless the user is in constant contact with Kompasset or has visited us recently. This can be done either by checking the date on the last journal entry or by checking with the staff (especially varmestue or outreach).

The "check-out" and anonymizing of data is done by pulling out a list of users based on the first date of registration (indskrivningsdato). The list of users is then read out loud together, in a staff meeting, once a month, where we together can see who the persons are who were registered on that month, 2 years ago. When all the names are checked, the stamkort of the persons who have not been in contact with us for 2 years are anonymized (manually and individually). Anonymizing means that we delete the name of the person, potential registered contact information, information that can identify them and potential attached documents. All the related journals are checked so that the full name is not mentioned in any of them – that is why it is important that journals only contain initials of the first name. In this way, even after all users are anonymized, we can keep the important knowledge

contained by the notes, to be able to use in the analysis of the challenges met by people and use it for advocacy.