



**DATA POLICY**  
**version: 01 July 2023**

1. References :

- a. GDPR – EU regulation 2016/679, published : [PbEU](#) 2016, L 119/1
- b. ICMM statutes
- c. Meeting Secretariat General 202302 – Jun2023
- d. *More info :* [General Data Protection Regulation](#)  
[Règlement général sur la protection des données](#)

2. Scope of this policy :

This policy aims to specify and clarify irrefutably how ICMM deals with, stores and manages the Personally Identifiable Information (PII) of all its member States and state representatives.

3. Collection of data :

- a. Data to be collected.

ICMM collects data required to comply with its vision and mission in respect of its values. This data can be non-PII (e.g. office mail coordinates) or PII data, including names and contact details of the National Delegates. For this policy, the intended PII data are considered non-open-source data. If PII data are however or become stated in open sources, ICMM will thereafter no longer be responsible for such data.

- b. Collection of data:

When a member state joins ICMM, the contact details of the Surgeon-General and the National Delegate of the state to ICMM are collected. When these details should change, the member state must communicate the new contact details to the Secretariat General of ICMM.

The Secretariat General by its office manager or the executive secretary can update these details during the year when deemed necessary for the good functioning of its office.

- c. Data agreement:

By requesting and accepting membership of ICMM, a member state accepts the collection, storage and management of the non-PII and PII data related to the Surgeon-General, the national delegate and any other persons necessary for the fulfilment of ICMM's vision and mission. This will be explicitly mentioned in the



admission formula. Upon becoming a member, the national delegate will receive a copy of this policy.

For existing members, a copy of the policy and the acceptance thereof by the member state (through the national delegate) will be handed over but however no later than at the General Assembly.

#### 4. Storage of data :

- a. Public space for only non-PII data

The public space and storage folders which are open to non-members,

- b. Private organisation space

in this space and these folders managed by the Secretariat General, all necessary data and information can be stored to ensure the proper functioning of the ICMM and to allow effective communication between the ICMM bodies and the ICMM members.

- c. Timeframe

The non-PII data collected by ICMM will be stored without any time limit for as long as the technical possibilities allow.

The PII data of ICMM members collected by ICMM will be stored for as long as the person is holding his /her position. Upon vacating his /her position, everyone is entitled to request the deletion or transfer of his or her data. Normally, the PII data of the person vacating the position will be replaced by the new member's PII data holding the position.

The PII data of non ICMM members collected by ICMM will be stored without any time limit but will be subject to a yearly evaluation of the necessity of storage by the office of the Secretariat General.

- d. Stored data deleting Procedure.

The Secretariat General by its office manager and/or executive secretary will be responsible for the deleting of all data which storage time has come to an end. In case of PII data, the Secretariat General will inform the respective persons of the removal of their data in writing requesting an email acknowledgement.



## 5. Securing of data

### a. Process.

The Secretary-General of ICMM will take all necessary precautions to safeguard data and especially PII data collected and stored by ICMM.

He will designate a data protection officer responsible for the control and execution of these precautions. PII data of ICMM members and of non-ICMM members must be secured using limited folder accessibility of minimum 2 levels.

Yearly, the designated data protection officer will submit recommendations and regulations about GDPR to the Secretary-General.

### b. Responsibility.

Data protection is a matter of everyone's concern and responsibility. Within ICMM and the ICMM bodies, the Secretariat General ensures the good collection and storage of all data. The Secretariat General will not communicate PII data to members or non-members without the explicit written consent of the data protection officer, designated by the Secretary-General.

## 6. Sharing of data with Third parties (= part of "management of data")

### a. Shared data

Non-PII data can be shared by simple agreement by the Secretary-General or one of the delegated functionaries within the official bodies in the ICMM.

PII data of ICMM members cannot be shared with third parties without the explicit consent of the Secretary-General on advice from the data protection officer and if sensitive the legal advisor of the ICMM.

### b. Applicable Third parties

ICMM may only share collected data, non-PII and PII, with third parties who are able to actively assist ICMM in achieving its vision and mission being *knowledge beyond borders & becoming the world's leading organisation in military medicine* and meeting the criteria as described hereunder.

Before sharing, any third party will however irrevocably and in writing subscribe itself and undertake to respect the values of ICMM (*independence, neutrality, impartiality, universality, reliability, quality and transparency*) including the management of the shared data.



c. Purpose(s) of sharing data with Third Parties

The purposes of ICMM for sharing data are to:

- (1) create more knowledge about the existence, vision and mission of ICMM
- (2) create more reaching-out possibilities in the world of medicine
- (3) create awareness of ICMM members and thereby to facilitate contact and possible support for their activities

d. Agreement between ICMM and third parties

Every intent to share data with a third party must be subject to a written, binding agreement between ICMM and the third party.

The written agreement will be prepared on advice from the legal advisor and be provided to approved third parties.

In the event of it being found that any third party do not comply fully and in all respects with the written agreement, all shared data shall be returned and removed by the third party

The Secretary-General will during the General Assembly, present the list of third parties with whom data is being shared and indicate the effects on ICMM of this sharing.

In the event of any ICMM member state or national delegate opposing the sharing of its/his /her data, ICMM and the third parties will respect the wish and all Third parties shall immediately remove all such related shared non-PII and PII data