



Dr Klown Privacy Notice

Last revised: 28 April 2022

We respect your privacy and are committed to ensuring that your personal data is protected.

We are **Dr Klown**, a Voluntary Organisation, bearing registration number VO/0582, under the Laws of Malta, having its registered address as P.O. Box 79, Il-Marsa, Malta ("**We**" / "**Us**" / "**Our**"). We are the data controllers of your personal data obtained and/or otherwise processed through the course of the recruitment phase and potentially throughout the course of your volunteering journey with Us.

We recognise our obligations as data controllers and are committed to complying with all applicable laws, including the Data Protection Act (Cap 586 of the Laws of Malta) and the EU General Data Protection Regulation (2016/679).

The terms "**you**" and "**your**" means you, the applicant to join Dr Klown as a volunteer.

What is considered Personal Data?

"Personal data" refers to all information which can render you personally identifiable, such as your name, surname and address and includes all other information and documentation that can arise or be produced which can identify you personally.

When and How do we collect and process your personal data?

We collect your personal data:

- I) during the recruitment phase, and potentially
- II) throughout the course of your volunteering journey with Us

During the recruitment phase, we collect your data through the recruitment application form filled in by you, and through any interviews that may be arranged prior to your potential recruitment. During the interview, we will ask additional questions that vary from one interview to another, depending on the role that you are applying for and depending on answers provided in your application form.

During the course of volunteering, we will continue to collect personal data as will be necessary in order for the voluntary work to be carried out. For example, personal data will need to be collected in order to create work schedules/rosters, whilst other data may be generated through internal and external feedback, and performance reviews.

What data do we collect, for what purpose, and based on what legal justification?

Under applicable data protection law, there are 6 legal grounds which we can rely on to process your personal data. In our case, we rely on 4 of these 6 grounds, referred to in the table in simplified terms as 'Performance of the Contract', 'Legal Obligation', 'Legitimate Interest' and 'Consent'.

The table below explains the purpose (reason) behind why we collect your data. It also sets out a non exhaustive list of data that we collect for fulfilling each purpose, and the applicable legal justification.

Purpose	Data Type	Legal justification for processing
To identify you and contact you during the recruitment phase, including to inform you if a position you might be interested in becomes available.	<ul style="list-style-type: none"> - Name and surname - Address - Email Address - Identity Card number - Date of birth - Contact details 	<ul style="list-style-type: none"> • Legitimate Interest
To identify you and contact you once you are volunteering with Us.	<ul style="list-style-type: none"> - Name and surname - Address - Email Address - Identity Card number - Date of birth - Contact details 	<ul style="list-style-type: none"> • Performance of the Contract • Legitimate interest
To determine whether or not you are suitable to occupy the role being applied for.	<ul style="list-style-type: none"> - Education, qualifications, work experience, skills, certification, professional references, awards, etc) - Any other information that you may choose to provide together with your application or during the interview. - Internal notes taken and evaluations made during the recruitment stage - Data relating to your other commitments and general availability - Medical data, only if strictly necessary depending on your role (for example, through minor psychological evaluations carried out by our professional psychologists) - Police Conduct Certificate 	<ul style="list-style-type: none"> • Legitimate interest
To enable the performance of your volunteering duties	<p>Throughout the course of your engagement, we will be required to process certain information for you to volunteer with us. Such processing will be necessary to make volunteering possible, and includes:</p> <ul style="list-style-type: none"> - work availabilities; - record of volunteering history ; - job performance reviews; - internal and external feedback; and - personal data generated through your use of our systems and devices. 	<ul style="list-style-type: none"> • Performance of the Contract • Legal Obligation • Legitimate Interest
To use your image, footage and name or stage name on our website and for promotional material in general.	<ul style="list-style-type: none"> - Image - Footage - Name or stage name 	<ul style="list-style-type: none"> • • Consent

Purpose	Data Type	Legal justification for processing
Protection against future claims, or to institute future claims	<ul style="list-style-type: none">- Identification Information- Contact Details- History of volunteering activity with us- Any further data that may be relevant to a dispute or legal proceedings that may be necessary to protect and defend ourselves.	<ul style="list-style-type: none">· Legitimate Interest

Personal Data and third parties

We will not sell or transfer your Personal Data to third parties.

Your personal data will be shared and processed internally to other Dr Klown volunteers on a strict confidential and need-to-know basis. For example, Our volunteers in administration and project coordination will have access to your personal data in order to create, plan and manage activities and work schedules/rosters. Furthermore, our physiological support personnel may be present during Klown Doctor interviews to carry out a psychological examination to determine whether or not the applicant is suitable for that role.

Externally, we will share your personal data to relevant authorities/ courts/ tribunals if we are required to do so by law.

There will be no data transfers to third countries.

Your Rights

You enjoy various rights in relation to your personal data:

Right of Access – you have the right to ascertain whether we hold personal data about you and to receive a copy of such personal data;

Right to Complain – if you have any complaints regarding our processing of your personal data note that you may contact us at the contact details provided below.

You also have a **right to lodge a complaint** with the Information and Data Protection Commissioner in Malta. The Information and Data Protection Commissioner (“**IDPC**”) may be contacted at idpc.gov.mt. As controllers who are committed to safeguarding your rights, we would appreciate the chance to deal with any of your concerns before you approach the IDPC;

Right to Erasure – you have a right to request that we delete your data in certain circumstances. Kindly note that we have a right to retain the personal data that relates to a contract between you and us, and to defend or pursue our legal right as well as to fulfil our legal obligations.

Right to Object – you have a right to object to our processing of your personal data and request that we stop such processing where we rely on our or a third party’s legitimate interest/s. You also have the right to object to the use of your data for direct marketing purposes at any time.

Right to Data Portability – you have a right to request to receive the personal data concerning you and that you have provided us with, in a structured, commonly used and machine-readable format. If technically feasible, you may also request that such data is transmitted by us directly to a third-party controller of your choice;

Right to Rectification – you have the right to update, correct and rectify any inaccurate personal data we process about you; and

Right to Restriction – you have a right to request that we restrict your personal data in certain circumstances.

Data Retention

Your personal data shall be retained exclusively for the period which is lawfully permissible.

On the basis of legitimate interest, personal data collected during the recruitment phase will be retained for a period of three years from the data of the application. We reserve the right to contact you during this time period if we believe that there is an opportunity or volunteering opening that you may be interested in.



If you become a volunteer with Us, on the basis of legitimate interest we will retain your personal data for up to 3 years following the end of your journey with Us.

When your personal data is no longer needed, your personal data shall be immediately and irrevocably deleted or destroyed.

How we protect your Personal Data

We take the protection of your personal data very seriously and are committed to take the appropriate technical and organisation measures to protect your data against unauthorised or unlawful processing. We may store your data in physical paper files as well as electronically on our technology systems. We take measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

Automated Decision Making

Your personal data will not be processed for the purposes of any decisions taken solely on the basis of profiling methods or algorithmic/automated decision-making without human intervention.

Contact Details

Please do not hesitate to contact us regarding our processing practices on these email addresses: info@drklown.org, admin@drklown.org.

Updates to this Privacy Notice

This Privacy Notice may be updated at our sole discretion to cater to change in processing activities or relevant laws. If any updates to this Privacy Notice occur, you will be notified of this change on the email address provided on the Recruitment Application.
