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# CIVICOS INSTITUTE

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GOVERNANCE DOCUMENT

## Data, Privacy & Security Policy

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**Document ID:** 06

**Version:** 1.0

**Status:** DRAFT — Pending Board Adoption

**Contact:** NCerbone@civicos-institute.org

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## Purpose

Defines collection, processing, storage, and protection of personal data.

## Collection and Minimization

Collect only necessary data for stated purposes.

### Data Classification Table

Class	Definition	Examples
Public	No material harm if disclosed	Published reports
Internal	Operational sensitivity	Planning docs
Confidential	High sensitivity	Personnel/donor data
Restricted	Maximum sensitivity	Credentials/legal files

### Lawful Basis Table

Basis	Usage
Consent	Opt-in communications
Contract	Service delivery obligations
Legal obligation	Regulatory compliance
Vital interests	Safety-critical exceptions
Public task	Mission operations
Legitimate interests	Balanced organizational need

### Data Subject Rights Table

Right	Response SLA
Access	30 days
Rectification	30 days
Erasure	30 days
Portability	30 days
Restriction	30 days
Objection	30 days

Right	Response SLA
Complaint	30 days

## Security Controls Table

Control	Implementation
MFA	Required for privileged access
Least privilege	Role-based access control
Encryption	At rest and in transit
Logging	Audit and retention controls
Incident response	Defined escalation and recovery
Vendor review	Third-party diligence workflow

## Breach Response

Regulatory notice target within 72 hours where required.

## Third-Party Sharing

Sharing requires lawful basis and safeguards.

## AI Processing

Personal data is not submitted to external AI models without explicit approved legal basis.

## Privacy Contact

NCerbone@civicos-institute.org

## Adoption and Signatures

Adopted by Board on: \_\_\_\_\_

Board Chair: \_\_\_\_\_

Date: \_\_\_\_\_

Executive Director: \_\_\_\_\_

Date: \_\_\_\_\_

*Next review due:* \_\_\_\_\_