WOMAFREESM
The World Organization of Women Nations

WOMAFREESM WORLD WOMEN'S ASSEMBLY

Privacy and Consent Framework

Founding Data Protection Framework

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ARTICLE I.

PURPOSE AND SCOPE

This framework defines how Womafreesm World Women's Assembly collects, processes, stores, shares and deletes personal data. It applies to all data collected through the Assembly's forms, protocols and operational systems.

This framework applies to data from: Case Submitters; Partner Organizations; Experts; all individuals whose information is processed as part of case review, research or partnership activities.

ARTICLE II.

LEGAL FRAMEWORK

The World Organization of Women Nations Womafreesm Inc. is a not-for-profit corporation registered in the State of Florida, United States, with 501(c)(3) tax-exempt status. The Assembly operates internationally, including in jurisdictions covered by:

- General Data Protection Regulation (GDPR): European Union;
- UK General Data Protection Regulation (UK GDPR): United Kingdom;
- applicable national data protection laws in countries where the Assembly operates.

The Assembly applies the highest applicable standard of data protection regardless of the submitter's location.

ARTICLE III.

DATA CONTROLLER

The data controller is The World Organization of Women Nations Womafreesm Inc., a Florida not-for-profit corporation with 501(c)(3) status.

Questions about data processing, changes to the publication consent level and withdrawal of consent are sent through the contact form on womafreesm.com with the topic Data and privacy request. Case Submitters may also write from the contact they gave, with their case number.

ARTICLE IV.

CATEGORIES OF DATA COLLECTED

4.1 Case Submission Form

Submitter identity (name, pseudonym or anonymous); country; contact information; secure communication channel; case description; dates; affected persons description; evidence; safety assessment; publication consent level.

4.2 Partner Application Form

Organization name, country, website, legal status, team size; primary contact (name, position, email, phone); organizational mission and experience; due diligence information; conflict of interest declaration.

4.3 Expert Network Application Form

Full name, country, nationality, contact information; professional background; areas of expertise; languages; availability; conflict of interest declaration.

4.4 Case processing data

Verified Case Notes; evidence collected during verification; expert assessments; correspondence with submitters; internal classification and routing decisions.

ARTICLE V.

LEGAL BASIS FOR PROCESSING

The Assembly processes personal data on the following bases:

> **Consent**
> Explicit consent provided through the submission forms. Consent is specific, informed and freely given. Consent can be withdrawn at any time (see Article XI).

> **Legitimate interest**
> Processing necessary for the Assembly's mission of advancing women's rights through evidence-based research and institutional change, where such processing does not override the fundamental rights of the data subject.

> **Legal obligation**
> Processing required by applicable law (e.g., tax reporting for donations, legal proceedings).

ARTICLE VI.

CONSENT PROCEDURES

6.1 Informed consent

Before providing data, every individual must understand:

- what data is being collected;
- why it is being collected;
- how it will be used;
- who will have access;
- how long it will be retained;
- how to withdraw consent.

6.2 Publication consent levels

Case Submitters choose one of three levels:

- Anonymized: the case may be referenced publicly without identifying information.
- Named: the case may be referenced publicly with the submitter's name or organization.
- Fully confidential: the case must remain entirely confidential.

The publication consent level may be changed by the submitter at any time by contacting the Assembly (see Article III).

ARTICLE VII.

DATA MINIMIZATION

The Assembly collects only the data necessary for the specific purpose. No additional data is requested beyond what is required for case assessment, partner evaluation or expert registration.

ARTICLE VIII.

DATA STORAGE AND SECURITY

Personal data and analytical data are stored separately where possible.

All data is stored in systems with appropriate security measures, including access controls, encryption in transit and reasonable physical security.

Case data classified as Risk Level 3 or 4 (Case Intake Protocol v2.0, Article VI) is subject to enhanced security measures.

ARTICLE IX.

ACCESS CONTROL

Access to personal data is granted only to persons who require it for their specific role:

- Case data: Executive Director, Case Intake Coordinator, assigned verification specialists, Case Review Board members, Director of Legal Affairs (for LRR cases), Director of Research & Evidence (for research integration).

- Partner data: Executive Director, Partnership Coordinator, Director of Global Coordination.
- Expert data: Research Coordinator, Director of Research & Evidence.

Cases are first sorted by a computer program based on artificial intelligence: it collects the case data and marks what the case is about. A person reads every case and makes every decision. The provider of the program processes data under a data processing agreement and does not use case data to train its models.

No team member may access data outside their assigned responsibilities without authorization from the Founder & President.

ARTICLE X.

CROSS-BORDER DATA TRANSFER

The Assembly operates within The World Organization of Women Nations Womafreesm Inc., which is registered in the United States, and processes data from individuals in multiple countries, including EU and UK jurisdictions.

Where personal data is transferred from the EU/UK to the United States, the Assembly ensures appropriate safeguards are in place, which may include: standard contractual clauses; data processing agreements; or other mechanisms recognized under GDPR Article 46.

Data shared with Partner Organizations or Experts in other countries is shared only to the extent necessary and with appropriate contractual protections.

ARTICLE XI.

RIGHT TO WITHDRAW CONSENT

Any individual may withdraw their consent to data processing at any time by contacting the Assembly (see Article III).

Upon withdrawal:

- processing of the individual's personal data ceases;
- the individual's personal data is deleted or anonymized within 30 calendar days;
- if the data has already been integrated into anonymized research or evidence products, the anonymized data may be retained;
- withdrawal does not affect the lawfulness of processing carried out before withdrawal.

ARTICLE XII.

DATA SUBJECT RIGHTS

Individuals whose data is processed by the Assembly have the right to:

- access: request a copy of their personal data held by the Assembly;
- rectification: request correction of inaccurate data;
- erasure: request deletion of their data (subject to legal retention obligations);
- restriction: request limitation of processing;
- portability: request their data in a structured, commonly used format;
- objection: object to processing based on legitimate interest.

Requests are processed within 30 calendar days. Complex requests may require an extension of up to 60 calendar days with notification.

ARTICLE XIII.

DATA RETENTION

Case data: retained for the duration of case processing and 5 years after closure for evidence base purposes. Anonymized data may be retained indefinitely.

Partner data: retained for the duration of the partnership and 2 years after termination.

Expert data: retained for the duration of registration and 2 years after deactivation.

Rejected applications: retained for 12 months, then deleted.

ARTICLE XIV.

ANONYMIZATION

When case data is used for evidence products (Evidence Briefs, Policy Briefs, Research Reports, Standards), personal data is anonymized before integration.

Anonymization means removal of all information that could directly or indirectly identify the submitter, affected persons or witnesses.

Anonymous case submissions retain the secure contact channel internally but are processed without identity information in all external and research contexts.

ARTICLE XV.

DATA BREACH PROCEDURES

In the event of a data breach:

- the breach is reported to the Founder & President within 24 hours of discovery;
- affected individuals are notified within 72 hours where the breach poses a risk to their rights;
- the relevant supervisory authority is notified within 72 hours where required by law (GDPR Article 33);
- the breach is documented with: description, affected data, affected individuals, measures taken, preventive actions;
- for cases involving safety risks (Risk Level 3-4), emergency safety measures are activated immediately.

ARTICLE XVI.

RESPONSIBLE PERSONS

Founder & President

Overall responsibility for data protection compliance. Receives breach notifications. Authorizes exceptional data access.

Executive Director

Data protection for case submissions and partner applications until the Case Intake Coordinator and the Partnership Coordinator are appointed.

Case Intake Coordinator

Data protection for case submissions. Manages consent levels. Processes withdrawal requests for case data.

Partnership Coordinator

Data protection for partner applications and partner data.

Research Coordinator

Data protection for expert registrations. Anonymization of case data for research purposes.

ARTICLE XVII.

REVIEW AND UPDATES

This framework is reviewed annually or when significant changes occur in applicable data protection legislation, Assembly operations or data processing activities.

This framework establishes operational data protection standards for the Assembly.

This framework derives its authority from the Assembly Statute (v2.0).

This document is published in English and Russian. In case of discrepancy, the English text prevails.

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