

UIAA STANDARD OPERATING PROCEDURE SOP-0209

DATA PROTECTION

Version: V01

Replaces version: New

Valid from: 1 Sept. 2026

TABLE OF CONTENT

1. INTRODUCTION / PURPOSE	2
2. POLICY	2
2.1. DATA PROTECTION PRINCIPLES.....	2
2.2. LEGAL BASIS FOR PROCESSING.....	2
3. CATEGORIES OF PERSONAL DATA HANDLED BY UIAA	3
4. COLLECTION & CONSENT	4
5. ACCESS CONTROL.....	4
5.1. DATA PROCESSING AGREEMENT (DPA).....	4
6. STORAGE & ARCHIVING	5
6.1. STORAGE & ARCHIVING.....	5
6.2. INTERNATIONAL DATA TRANSFERS	5
7. WEBSITE & COMMUNICATION	5
8. RIGHTS OF INDIVIDUALS (DATA SUBJECTS)	5
9. DATA BREACHES	6
10. RESPONSIBILITIES.....	6
11. RETENTION SCHEDULE	6
12. UIAA PRIVACY POLICY	7
13. UIAA CONSENT FORM – USE OF PERSONAL DATA	7
13.1. REGISTRATION FOR EVENTS AND MEETINGS	7
13.2. PHOTOS & MEDIA.....	7
14. UIAA DOCUMENTS.....	7
HISTORY	8

Approved by:

Peter Muir
UIAA President

André von Rotz
Chief Executive Officer

1. INTRODUCTION / PURPOSE

This SOP applies to all UIAA staff, Commission members, volunteers, and external contributors who process personal data (including names, email addresses, photographs, contact details, and similar information) in the course of UIAA activities.

It governs the **collection, use, storage, sharing, publication, archiving, and deletion** of personal data and is subject to:

- the Swiss Federal Act on Data Protection (FADP), and
- where applicable, the EU General Data Protection Regulation (GDPR)

2. POLICY

2.1. Data Protection Principles

The UIAA processes personal data in accordance with the following principles:

- **Lawfulness & Transparency**
Personal data is collected and processed only for legitimate UIAA purposes, and individuals are informed about how their data is used.
- **Purpose Limitation**
Personal data is used only for the specific purpose for which it was collected (e.g. volunteer coordination, governance records, event administration).
- **Data Minimisation**
Only data strictly necessary for the stated purpose is collected.
- **Accuracy**
Personal data is kept accurate and up to date. Errors are corrected promptly.
- **Storage Limitation**
Personal data is retained only for as long as necessary and is archived or deleted when no longer required.
- **Confidentiality & Security**
Access to personal data is restricted to authorised persons and protected through appropriate technical and organisational measures.

2.2. Legal Basis for Processing

Personal data is processed by the UIAA on one or more of the following legal bases, as applicable:

- Consent is given via the applicable UIAA mechanism (event registration form, mailing-list opt-in, or signed consent form — see 13. *Collection & Consent*). Consent may be withdrawn, and objections to processing may be lodged, at any time by written notice to the UIAA Office (Data Protection Coordinator). Withdrawal or objection takes effect on receipt and does not affect the lawfulness of processing carried out prior to that date.
- Where personal data of a minor is processed on the basis of consent, consent shall be obtained from a parent or legal guardian, in accordance with applicable law.
- The performance of UIAA governance, statutory, or contractual obligations: where processing is necessary for the execution of agreements with volunteers, Commission members, service providers, or other stakeholders, or for the management of UIAA governance and operational activities.

- The legitimate interests of the UIAA: where processing is necessary for the legitimate interests pursued by the UIAA, provided that such interests are not overridden by the interests, fundamental rights, or freedoms of the data subject.
- Compliance with legal or regulatory obligations: where processing is necessary to comply with applicable Swiss law (including the Swiss Federal Act on Data Protection) or other binding legal requirements.

3. CATEGORIES OF PERSONAL DATA HANDLED BY UIAA

The UIAA processes personal data only to the extent necessary for its governance, operational, communication, and event-related activities.

Personal data processed by the UIAA includes the following categories:

a. Volunteer and Commission data

Names, roles, contact details, and Commission or Working Group membership information processed for governance and operational coordination.

b. Communication and mailing data

Names and email addresses used for newsletters, internal communications, and stakeholder updates, based on consent or legitimate interest where applicable.

c. Event-related data

Registration and participation data, including contact details, travel and accommodation information, and where necessary identification documents required for visa or entry purposes. Such data is processed strictly for event administration and compliance with travel or legal requirements.

d. Website, communication, and media content

Publicly available content such as biographies, organisational contact details, publications, and photographs or videos taken at UIAA events, processed for communication, documentation, and promotional purposes in accordance with applicable consent requirements.

e. Governance and institutional records

Meeting minutes, decisions, correspondence, and related documentation of UIAA governing bodies, processed for institutional, legal, and historical record-keeping purposes.

f. Special Categories (Health Data)

Medical conditions, allergies, physical limitations, or emergency information collected for event participation or safety purposes. Processed only based on explicit consent, restricted access, and deleted once the purpose is fulfilled. Where explicit consent cannot be obtained in time, such data may exceptionally be processed to protect the vital interests of the individual (e.g. medical emergencies during events).

g. Archival data

Historical records retained for legal, governance, or institutional continuity purposes, subject to appropriate access controls and security measures.

Personal data is processed under one or more of the following legal bases: consent,

performance of organisational functions, legitimate interests, or compliance with legal obligations, as applicable.

4. COLLECTION & CONSENT

- **Volunteers / Members**
Consent must be in writing, documented where personal data is used beyond governance or legal requirements (e.g. photos, profiles, communications).
- **Mailing Lists**
Opt-in consent is required. Unsubscribe must be available at all times.
- **Photos & Media**
Written consent is required for identifiable individuals used in public-facing materials. Group or event registrations must include a photo consent clause.
- **Websites**
Personal contact details are published only with explicit consent. Official addresses (e.g. info@...) are preferred.

5. ACCESS CONTROL

- **UIAA Office & Staff**
Access limited to data necessary for assigned duties.
- **Commission Delegates, WGs, Specialist & experts**
Access limited to Commission-related data only.
- **Executive Committee, Management Board & Working Group Members**
Access limited to documents strictly required for their role.
- **External Individuals or Organisations**
Must sign a Data Processing Agreement (DPA) where personal data is processed on behalf of the UIAA.

5.1. Data Processing Agreement (DPA)

Any external individual or organisation that processes personal data on behalf of the UIAA, and under its instructions, shall be considered a data processor and must enter into a Data Processing Agreement (DPA) prior to accessing or processing such data.

This applies in particular to external IT and cloud service providers, consultants or contractors with access to personal data, Working Group specialists or advisors processing data under UIAA instruction, event registration or ticketing platforms, and website, communication or analytics service providers acting on behalf of the UIAA.

A DPA shall not be required where external parties act as independent data controllers, determining their own purposes and means of processing. In such cases, data sharing shall be governed by appropriate data-sharing agreements in compliance with applicable data protection law.

The following activities are outside the scope of a DPA:

a. Internal UIAA personnel

UIAA staff acting under UIAA authority within internal systems.

b. Internal governance participants

Commission members, Presidents, volunteers, experts and Working Group participants

processing personal data solely within UIAA-controlled systems and under UIAA instruction.

c. External independent controllers

UIAA Member Federations and other external organisations receiving personal data from the UIAA and processing it independently. Their use of data shall be governed by data-sharing or cooperation agreements defining permitted purposes.

All DPAs and data-sharing agreements shall be retained by the UIAA Office.

6. STORAGE & ARCHIVING

6.1. Storage & Archiving

- Personal data is stored only in official UIAA systems (e.g. SharePoint, Shimbi, Outlook Member's Database).
- Personal storage (private devices or cloud accounts) is not permitted.
- GA and MB minutes are retained permanently for legal and organisational history.

6.2. International Data Transfers

Where personal data is processed or stored using systems located outside Switzerland, the UIAA ensures appropriate safeguards are in place, including contractual protections and adequate data protection standards, such as Standard Contractual Clauses or reliance on a jurisdiction recognised as offering adequate protection by the FDPIC, and in accordance with Swiss law and, where applicable, the GDPR.

7. WEBSITE & COMMUNICATION

- Websites operated by the UIAA shall implement a cookie banner allowing users to provide prior consent for non-essential cookies.
- A public Privacy Policy shall be maintained on the UIAA website and kept up to date to reflect relevant data processing activities.
- Personal data published on UIAA websites (including contact details, biographies, or images) shall only be processed where a valid legal basis exists, including consent or legitimate interest where applicable.
- Group emails shall be sent using appropriate mailing tools or BCC to protect recipient email addresses from disclosure.
- Personal email addresses shall not be shared with third parties without a valid legal basis or consent.

8. RIGHTS OF INDIVIDUALS (DATA SUBJECTS)

Individuals have the right to:

- **Access** their personal data (response within 30 days);
- **Correction** of inaccurate data;
- **Deletion**, unless retention is required by law or archival obligations;
- **Objection** to processing based on legitimate interests or withdrawal of consent, where applicable;



- **Data portability**, where applicable and technically feasible under applicable law.
- **Restriction of processing** in specific circumstances;
- **Complaint** — the right to lodge a complaint with the competent supervisory authority (the FDPIC in Switzerland, or the relevant authority under the GDPR where applicable).

Requests shall be submitted to the UIAA Office in writing. The UIAA may request reasonable identification to verify the identity of the requester. Requests shall be processed within 30 days of receipt, subject to extensions permitted under applicable law.

The UIAA may refuse or restrict requests where legal retention obligations apply, where processing is necessary for legal claims or defence, or where the rights of third parties or legitimate archival purposes would be adversely affected.

All requests shall be documented by the UIAA Office.

9. DATA BREACHES

In the event of a personal data breach, the following procedure applies:

- The UIAA Office must be informed immediately and without delay;
- The Federal Data Protection and Information Commissioner (FDPIC) must be notified as soon as possible where a high risk exists;
- Where GDPR applies, notification to the competent supervisory authority shall occur within 72 hours;
- Affected individuals shall be informed without undue delay where the breach is likely to result in a high risk to their rights or personality.

10. RESPONSIBILITIES

The UIAA Office is responsible for the overall implementation and day-to-day application of this SOP

The UIAA Office Manager acts as Data Protection Coordinator and is responsible for overseeing compliance with applicable data protection laws, including the Swiss Federal Act on Data Protection (FADP) and, where applicable, the EU General Data Protection Regulation (GDPR) and for maintain a registerevidencing such compliance. (Records of Processing Activities, per GDPR Art. 30 / FADP Art. 12)

All UIAA staff, Commission members, volunteers, and external contributors are required to comply with this SOP when processing personal data on behalf of the UIAA.

11. RETENTION SCHEDULE

Type	Retention Period	Notes
Volunteer contact list	Duration of active involvement, then up to 5 years for administrative continuity	The archived data shall have restricted access. Delete if legally required
Mailing lists (newsletters)	Until unsubscribe or withdrawal of consent	Must allow easy opt-out

**UIAA**International Climbing and Mountaineering Federation
UNION INTERNATIONALE DES ASSOCIATIONS D'ALPINISME

Type	Retention Period	Notes
Event registrations	Duration necessary for event administration and reporting, then archived.	May be retained in anonymised or aggregated form for reporting purposes
Photos/videos	Until consent withdrawn or project ends.	Archived only where justified for historical or organisational purpose
GA/MB minutes, official reports	Permanent archive	Retained for institutional and legal record; access may be restricted where appropriate
Financial records	10 years	Swiss law requirement

Retention periods shall be reviewed periodically to ensure continued necessity. Data shall be deleted or anonymised once the applicable retention period expires or the purpose for processing ceases, unless retention is required by law or justified by legitimate archival purposes.

12. UIAA PRIVACY POLICY

The UIAA Privacy Policy is published on the UIAA website and applies whenever personal data is collected or processed.

13. UIAA CONSENT FORM – USE OF PERSONAL DATA

The following questions will be requested when personal data must be collected:

13.1. Registration for events and meetings

☐ I agree that the UIAA may collect and use my personal details (name, email, phone, organization) for purposes of event participation, volunteer coordination, and related UIAA activities.

Please note: your name may appear in official UIAA records (e.g. meeting minutes, event reports) and may be archived permanently for organizational history, as part of the UIAA's governance obligations.

13.2. Photos & Media

☐ I agree that photos or videos taken of me during UIAA events may be used by the UIAA for reports, website, and communication materials.

☐ I do not agree to the use of my photos or videos in public-facing UIAA materials.

Consent under 13.2 may be withdrawn at any time by contacting the UIAA Office.

14. UIAA DOCUMENTS

- UIAA Privacy Policy on UIAA website: <https://www.theuiaa.org/uiaa-privacy-policy/>
- Data Processing Agreement (DPA) Typeform: <https://theuiaa.typeform.com/UIAA-DPA>

HISTORY

Version number	Valid from (date)	Description, comment
V01	1 September 2026	First SOP