TGEOC GLOBAL DATA PRIVACY POLICY & INTERNAL ADMIN BREACH RESPONSE PLAYBOOK

TGEOC GLOBAL DATA PRIVACY POLICY TGEOC/POL/09-25/00xyz

Last updated: 19th September, 2025.

The Global Embassy of Culture (TGEOC) operates in Europe, the Americas, Africa, the Middle East, Australasia and Asia. We are committed to protecting the privacy of all members, partners, and website visitors, and to complying with international privacy laws, including GDPR (EU), UK GDPR, CCPA (California), POPIA (South Africa), and others.

Our website and email services are hosted by **GoDaddy,** whose Privacy Policy applies alongside this policy.

1. Data We Collect

- Name, address, contact details.
- Country/region of residence, date of birth.
- Membership and payment details to simply pay for membership.
- Event participation records.
- Communication preferences and correspondence.
- Website technical data (e.g., IP address, browser type).

2. How We Use Your Data

- To manage membership and event participation.
- To send newsletters, updates, and announcements (with your consent).
- To comply with legal and reporting requirements.
- To improve our services and user experience.

We **never** sell your personal data.

HEADQUARTERS
THE GLOBAL EMBASSY OF CULTURE @ USPSC®
WEBSITE: WWW.TGEOC.ORG | WWW.USPSC.ORG
ADDRESS: 301 CLEVELAND AVENUE, GROVER, NC 28073
PHONE NUMBER: 1.704.937.2940

3. Lawful Basis

We process data under:

- **Consent** – when you opt in or join.
- **Contract** – to fulfil membership services.
- **Legal obligation** – tax and compliance.
- **Legitimate interest** – to operate effectively.

4. Sharing & International Transfers

- Shared only with trusted providers under strict confidentiality (e.g., payment, IT).
- Data may be stored in the USA or other countries via GoDaddy.
- We use safeguards (e.g., Standard Contractual Clauses) for regulated data transfers. We use Malwarebytes for Same Day Exploits and VPN's on computing machines and mobile devices.

5. Security

- Encrypted storage and controlled access.
- Password protection and multi-factor authentication.
- The safer method of multi-factor authentication is using a Google VIP Program Titan Gold and White Key membership.
- Using an Authenticator APP and NOT a text message.
- Turning off Bluetooth and Wi-Fi for banking or financial sensitive access with transactions. Switching to radio tower use of a mobile tower or cellular tower.
- Changing all passwords to 18-digit multi-hexial passwords that are kept on paper only and never stored on any service or machine – instead kept inside of a fireproof safe with dual or triple biometric access controls.
- A secret family and corporate duress word for attack and rape kill scenarios where passwords are demanded under duress.
- Regular security reviews.
- Regular safety reviews.

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6. Retention

- Data kept only as long as necessary or required by law.
- Former member data deleted/anonymised within **12 months,** unless law requires longer retention.

7. Your Rights

Depending on your location, you may:

- Access, correct, or delete your data.
- Restrict or object to processing.
- Request data portability.
- Withdraw consent at any time.

Contact: **privacy@tgeoc.org or tgeoc@uspsc.org**

8. Cookies

We use cookies to improve performance and analyse usage. Manage cookies in your browser settings.

9. Breach Notification

If a breach occurs, we will:

- Contain and investigate the incident.
- Notify affected members promptly.
- Inform regulators within required legal timelines.

10. Policy Updates

We review this policy annually and publish changes on our website. Significant changes will be communicated to members directly.

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INTERNAL ADMIN BREACH RESPONSE PLAYBOOK
(For TGEOC leadership & admin team only — not public)

1. **Purpose**

To provide a clear, rapid response process for data breaches affecting TGEOC or GoDaddy hosted systems.

2. **Immediate Actions (within first 0–2 hours)**

3. **Identify & Contain**
   - Disable affected accounts, devices, or website sections.
   - Stop unauthorised access by changing passwords and revoking tokens.

4. **Initial Assessment**
   - Determine: type of data exposed, number of people affected, and systems involved.
   - Classify breach as:
     - **Low Risk** – minimal data, contained quickly.
     - **High Risk** – sensitive personal data, large number affected.

5. **If Breach is on GoDaddy's Systems**

- Contact GoDaddy Security: security@godaddy.com or via their breach reporting portal.
- Request formal incident report and mitigation steps.
- Follow GoDaddy's guidance while keeping internal logs.

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6. **If Breach is on TGEOC Internal Systems**
- Isolate compromised devices/accounts.
- Reset all credentials with strong, unique passwords.
- Apply patches or security fixes immediately.

7. **Within 24 Hours**
- Convene Incident Response Team (President, Privacy Officer, IT/Admin lead).
- Decide if regulatory reporting is required (based on jurisdiction).
- Start drafting notification for affected members (see template below).

8. **Within 72 Hours (GDPR/UK GDPR requirement)**
- Notify relevant Data Protection Authority if breach involves EU/UK residents' personal data.
- Include:
    - Description of breach.
    - Categories of personal data involved.
    - Steps taken to mitigate.
    - Contact details for further info.

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9. Member Notification Template

Subject: Important Notice: Data Security Incident

Dear [Name],

We are writing to inform you of a recent data security incident that may have affected your personal information.

What happened	[Brief, factual summary]
What data was involved	[Categories of data]
What we are doing	[Containment and prevention measures]
What you should do	[Actions like password changes, monitoring accounts]

We take your privacy seriously and are committed to addressing this swiftly. For questions, contact privacy@tgeoc.org or tgeoc@uspsc.org.

Sincerely,

Martin CJ Mongiello

10. Post-Breach (Within 30 Days)

- Review incident response performance.
- Update security protocols and training.
- Document the breach and lessons learned.
- END OF DOCUMENT

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