

## INSTRUCTIONS FOR USE OF PERSONAL DATA

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### INTRODUCTION

1. “Personal data” is data that can identify a person, such as his name, address, phone number, or age, including pictures and videos. “Sensitive personal data” is any personal data that reveals someone’s racial/ethnic origin, religious beliefs, physical/mental health, or sexual life.

2. Data protection regulations require that consent must be provided by a publisher in order for the congregation and branch office to collect and transfer his personal data in a lawful manner. Failure to comply with such regulations could bring reproach on the organization and lead to large fines and/or criminal prosecution of the organization, as well as of individuals.—Rom. 13:1.

3. The *Notice and Consent for Use of Personal Data* (S-290) form should be used so that: (1) the organization can properly inform the publisher of the use of his personal data; (2) the publisher is aware of the information provided on the Use of Personal Data page in the Privacy Policy section on [jw.org](http://jw.org); and (3) the publisher can consent to the use and transfer of his personal data for certain religious activities.

### REQUESTING CONSENT

4. A publisher, or the parent or legal guardian of a publisher who is a minor, should be invited by an elder to complete a *Notice and Consent for Use of Personal Data* (S-290) form on the following occasions:

- (1) When an individual is newly approved to become an unbaptized publisher
- (2) When a publisher (baptized or unbaptized) moves into the congregation and a signed consent form is not received with the letter of introduction
- (3) When an individual is reactivated or reinstated as one of Jehovah’s Witnesses regardless of whether the publisher previously signed a consent form or not

5. When inviting an individual to complete the consent form, the elder should explain the purpose of the form and, if needed, provide a printed copy of the Use of Personal Data page that is found in the Privacy Policy section on [jw.org](http://jw.org). The *Notice and Consent for Use of Personal Data* form is available in a variety of languages. It should be provided to the individual in the language he understands best. The elder should take the time to answer any questions the individual may have. The individual should be given the opportunity to read the complete Use of Personal Data page and to return the signed form within a reasonable period of time.

6. When inviting the parent or legal guardian of a publisher who is a minor to submit the form on behalf of the minor, the minor’s name should be printed on the top portion of the form. However, the minor should not sign or date the form. If local regulations require that both parents provide consent on behalf of a minor, then the second parent’s signature, name, and date should be written below that of the first parent. When the publisher reaches the age at which he is no longer considered a minor, he should be asked to sign and date the consent form already on file for him.

7. Individuals who desire to present student assignments during the Life and Ministry Meeting but who are not yet publishers do not need to sign a *Notice and Consent for Use of Personal Data* form.

### **TRANSFERS TO ANOTHER CONGREGATION**

8. When a publisher transfers to another congregation, the signed *Notice and Consent for Use of Personal Data* (S-290) form should be sent to the new congregation with the letter of introduction and *Congregation's Publisher Record* (S-21) cards. If the publisher refused to sign a consent form, call the Service Department before sending a letter of introduction.

### **CONGREGATION FILE**

9. The congregation secretary is responsible for maintaining the signed *Notice and Consent for Use of Personal Data* (S-290) forms in the congregation file. The secretary should keep the body of elders informed if anyone refuses to complete the form or later revokes his consent. The signed consent form for a publisher should be kept in the congregation file for as long as any records for that individual are retained.

### **REFUSAL TO CONSENT**

10. An adult publisher might initially refuse to sign the *Notice and Consent for Use of Personal Data* (S-290) form. If this occurs, an elder should take the time to answer any questions the publisher may have. Often, a clear explanation can help the publisher to feel comfortable with providing consent. However, the publisher should not feel pressured to sign the form. If consent for the use of personal data is not provided, the affected individual may remain a publisher (baptized or unbaptized) and the congregation may keep his personal data related to his activity as a publisher, including the information recorded on the *Congregation's Publisher Record* (S-21) card. However, the individual should be informed that the congregation or branch office may not be able to evaluate his suitability to fill certain roles within the congregation or participate in many congregation activities, such as serving as a regular pioneer, a ministerial servant, or an elder. His name or other personal data should not be posted on the information board, be entered on the jw.org website, or appear in any correspondence sent via jw.org e-mail. However, his limited personal data from the *Congregation's Publisher Record* (S-21) card could be used on internal congregation documents. Additionally, if the congregation's meetings are recorded for the purpose of being uploaded to JW Stream, the publisher could not be recorded in such congregation meetings.

11. A parent or legal guardian might refuse to sign the *Notice and Consent for Use of Personal Data* form for a publisher who is a minor. If the minor is an unbaptized publisher, no personal data should be collected for him. Nor should a *Congregation's Publisher Record* card be kept for him. The report of field service activity may be collected from the minor as long as his name is not written on the report. The count of the individual and his activity may then be added to the *Congregation's Field Service Report* (S-1) that is submitted to the branch office. If the minor is a baptized publisher, two elders should contact the Service Department for direction.

12. If at any time a publisher informs the elders that he wishes to revoke his consent for the congregation to use his personal data, two elders should call the Service Department immediately. The secretary should write the date of revocation on top of the *Notice and Consent for Use of Personal Data* form.