

# Privacy and Personal Data Protection Policy

## General Terms

This website <https://berehynia.org> (the "Website") is managed by the Charitable Organization Nadia's Vovk Charitable Foundation "Berehynia" (EDRPOU code: 44737912), a legal entity incorporated and operating in accordance with the laws of Ukraine (the "Organization").

The Organization has great respect for the confidential (personal) information of all persons, without exception, who have visited the Website, as well as those who use the services provided by the Website; in this regard, the Organization seeks to protect the confidentiality of personal data (information or a set of information about an individual who is identified or can be specifically identified), thereby creating and ensuring the most comfortable conditions for using the Website's services for each user.

This Privacy and Personal Data Protection Policy (hereinafter referred to as the "Policy") establishes the procedure for the Organization's processing of personal data, the types of personal data collected, the purposes of using such personal data, the Organization's interaction with third parties, security measures to protect personal data, the conditions for access to personal data, as well as contact information for the user to gain access, make changes, block or delete their personal data and address any questions that may arise.

## Collection and Use of Personal Data

The owner and administrator of the personal data of the Website users shall be the Charitable Organization Nadia's Vovk Charitable Foundation "Berehynia".

When the user deploys the services of the Website, the Organization processes the user's data, in particular:

- data provided by the user both when filling out registration forms and in the process of using the services
- cookies;
- IP addresses;
- parameters and settings of Internet browsers (User-agent).

The Organization collects only those personal data (for example, first and last name, login and password, email, contact phone number, date of birth, sex, etc.) that are knowingly and voluntarily provided by you as a personal data subject for the purpose of using the Website services, which, in accordance with the rules of the law, is the consent of the personal data subject to the processing of their personal data in accordance with the purpose of their processing stated in this Policy.

When visiting the Website, all logins to the system are recorded. Other information on user traffic is not processed or stored.

Please note: The Organization is limited to collecting the minimum scope of information necessary solely to fulfill the request of the personal data subject. In any case, when information that is optional is requested, the user will be notified at the time of collection of such information.

The Organization does not collect any information for the processing of which certain requirements are established by law, such as information on racial or ethnic origin, political, religious or ideological beliefs, membership in political parties and trade unions, conviction of a crime or sentence to a criminal penalty, as well as data related to health, sexual life, biometric or genetic data (in accordance with Article 7 of the Law of Ukraine *On Personal Data Protection*).

The Organization collects data on the statistics of visits to the Website. The data may contain information about the connection, traffic, user's browser, as well as the date, time, duration of work on the Internet and stay on the Website.

## **Processing of Personal Data**

The provided personal data shall be processed and stored in data centers where the equipment that ensures the functioning of the Website services is located. The provided personal data is processed and may be stored in the Personal Database or a separate table of the Website Database.

## **Purposes of Using Personal Data**

Your personal data is used to ensure the provision of the Website's Internet services, exchange of information/news, relations in advertising and communication in accordance with and in pursuance of the laws of Ukraine, including, but not limited to, *On Personal Data Protection, On Ratification of the Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data and the Additional Protocol to the Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data with Regard to Supervisory Authorities and Transborder Flows of Data, On Information, On Advertising, On Telecommunications, On Protection of Information in the Information and Telecommunication Systems, On State Support of the Mass Media and Social Protection of Journalists.*

## **Personal Data Retention Period**

Personal data shall be stored for no longer than necessary in accordance with the purpose of its processing.

After the subject of personal data ceases to be a user of the Website by deleting his or her account on the Website, his or her personal data shall be also automatically deleted.

## **Use of Cookies**

A cookie is a text file or files containing a small scope of information that is sent to a web browser and stored on a user's device. Such devices may include a computer, mobile phone or other device used by the user to visit the Website.

Cookies can be eternal (called persistent cookies) and stored on the computer until the user deletes them or temporary (called session cookies), i.e. stored only until the browser is closed. In addition, cookies are divided into first-party cookies (they are set directly by the Website visited) and third-party cookies (set by other websites).

Important:

- when the user visits the Website again, the cookie data is updated;
- in most cases, the web browser allows automatic storage of cookies on the user's device by default;
- disabling cookies may result in restriction of access to published materials and/or inadequate functioning of the Website services.

The Organization cares about its users and tries to make the stay on the Website as comfortable as possible, for this purpose the Organization needs to analyze the behavior, preferences and interests of the user using cookies. Such analysis will help the Organization to improve the experience of interaction with the Website, to determine the most convenient interface and navigation of the Service.

According to the classification of the International Chamber of Commerce, the Organization uses the following categories of cookies:

**Strictly Necessary Cookies.** They are required for the user to move through the web page and use certain services, for example, to access secure pages, register and authorize, search the Website. Also, they memorize the user's previous actions when going to the previous page in the same session.

**Performance cookies.** They aggregate information about how the Website is used. This data is stored on the user's device between web browser sessions. Examples of such data may include the following metrics: time spent on the Website, most frequently visited pages, understanding which sections and services of the Website were most interesting to the user, how effective a particular advertising and/or marketing campaign is, etc.

All information collected through performance cookies is intended for statistical and analytical purposes. Some cookie data may be provided to third parties that have permission from the website and solely for the purposes specified above.

**Functional cookies.** They are used to save parameters or configurations that are stored on the user's device between web browser sessions. Examples of such data may include the following metrics: username, profile photo, information on comments left, language version of the Website, location, information about whether the user has been provided with any information or selected preferences previously, as well as other Site settings.

These cookies also allow users to watch videos, participate in interactive activities (polls, voting) and interact with social networks.

To make the experience more pleasant after visiting the resource, these cookies remember the information provided by the user, increasing the efficiency of interaction with the Website.

Some cookie data may be provided to third parties which are authorized by the web resource and solely for the purposes specified above.

**Targeting cookies.** They are used to provide content that may be of interest to the user. This data is stored on the user's device between web browser sessions. Examples of such data may include the following metrics: tracking recommended text, graphics, audio and video material to avoid repeated display, managing targeted advertising, evaluating the effectiveness of advertising campaigns, information about user visits to other resources during transitions, as well as other settings of the Website.

The Website may share this information with other parties, including media clients, advertisers, agencies and related business partners, in order to provide high-quality targeted advertising.

**Cookies of third-party services and analytics services:**

For prompt delivery, better display and detailed analysis of the content on the Website, the Organization uses services owned by other third-party companies, such as Facebook, Twitter, Instagram, Alphabet Inc., Gemius and etc.

The Organizations listed as an example may use cookies on the user's device while working on the Website.

Please note that the Website cannot affect the operation of cookies used by these services. All the necessary information about their use can be found by visiting the relevant resource.

Terms of use of Google Analytics are available at <http://www.google.com/analytics/terms/ru.html>

The Privacy Policy of TNS Ukraine is available at <https://tns-ua.com/konfidentsialnost>

The Gemius Privacy Policy is available at <http://www.gemius.com.ua/politika-konfidentialnosti.html>

Privacy and personal data policy of Bigmir is available at [http://info.bigmir.net/privacy\\_policy](http://info.bigmir.net/privacy_policy)

Cookie management:

Major web browsers (listed below) are set to automatically accept cookies. To disable them, use the help function in your browser. Help can be accessed through the menu or by pressing F1.

Microsoft Edge - <https://privacy.microsoft.com/ru-ru/privacystatement>

Mozilla Firefox - <https://www.mozilla.org/ru/privacy/websites/#cookies>

Google Chrome - <https://support.google.com/chrome/answer/95647?hl=ru>

Opera - <http://help.opera.com/Windows/11.50/ru/cookies.html>

Safari for macOS - [https://support.apple.com/kb/PH21411?locale=en\\_US](https://support.apple.com/kb/PH21411?locale=en_US)

Important:

configuration of cookie settings for mobile device web browsers may differ;

it is worth reminding you that full-fledged work with the Website is available only when using cookies;

disabling cookies may result in restricted access to the content and inadequate functioning of the Website services.

To contact the Organization regarding the use of cookies, send an email to [Berehynia.foundation@gmail.com](mailto:Berehynia.foundation@gmail.com)

If the user does not enable the use of cookies or deliberately deletes all cookies from his/her web browser, then upon further visiting the Website, the user will be re-offered to enable and use cookies.

Information about users obtained through cookies is not sold or distributed in the public domain, and is the property of the Organization that owns the resource.

## **Interaction of the Website with Other Resources**

When the user deploys the services, the pages of the Website may contain codes of other Internet resources and third parties, as a result of which such Internet resources and third parties receive your data. Therefore, these Internet resources may receive and process information that you have visited these pages, as well as other information transmitted by the user's browser. Such Internet resources may include:

- banner display systems (e.g., DoubleClick for Publishers, Admixer, AdRiver, etc.)
- social networking plug-ins (e.g., Discus, Facebook, Twitter, Google+).

The use of these services of the Organization is necessary for the operational analysis of visits to the Website, internal and external evaluation of the Website traffic, visit depth, user activity. The Organization does not store or process data received from these services.

Accordingly, if the user for any reason does not want these services to have access to his or her personal data, the user can voluntarily log out of his or her account or profile, clear cookies (through his browser).

## **Safety of minors**

The website is not intended for underage users. The Organization takes security issues very seriously, especially in relation to persons under the age of majority, and therefore, for its part, the Organization appeals to parents to explain to their children about Internet security issues, their specific purpose and need to use certain services of the Website.

## **Interaction of the Organization with Third Parties Regarding Personal Data**

The Organization does not transfer personal data to third parties, except when such transfer is required by law, at the request of the personal data subject or in other cases set forth in this Policy. The Organization understands that personal information is a value and inalienable content, including the personal non-property rights of any individual, therefore, it takes all possible measures to protect the personal information of users voluntarily and knowingly transferred to the Organization.

The Website may contain links to other websites (for informational purposes only). When you follow a link to other websites, this Policy will not apply to such websites. In this regard, the Organization recommends that you review the privacy and personal data policy of each website before submitting any personal data that can identify you.

## **Confidentiality of the Personal Data Subject's Activity on the Website**

Information about the activity (traffic) on the Website of users passing through the network or the user's email is protected in accordance with the law. That is, the Organization does not in any way or manner violate the secrecy of the user's "activity" when the latter uses the Website services.

## **Personal Data Protection**

The Organization uses generally accepted standards of technological and operational protection of information and personal data from loss, misuse, alteration or destruction. However, despite all efforts, the Organization cannot guarantee absolute protection against any threats arising outside the scope of the Organization's regulation.

The Organization ensures the application of all relevant confidentiality obligations, as well as technical and organizational security measures to prevent unauthorized or unlawful disclosure or processing of such information and data, their accidental loss, destruction or damage.

The Organization provides access to information and personal data only to authorized employees who have agreed to ensure the confidentiality of such information and data in accordance with the requirements of the Organization.

The dissemination of personal data without the consent of the personal data subject or his/her authorized person is allowed in cases specified by law and only (if necessary) in the interests of national security, economic well-being and human rights.

## **Terms and Conditions of Access to Personal Data**

The procedure for access to personal data of third parties is determined by the terms of the user's consent provided to the owner of personal data to process this data, or in accordance with the requirements of the law.

The user has the right to obtain any information about himself/herself from any subject of relations related to personal data, provided that the user indicates his/her last name, first name and patronymic, place of residence (place of stay) and details of the document certifying the individual submitting the request, except in cases established by law.

The user's access to data about himself/herself is free of charge.

The user's access to his/her personal data may not be delayed.

Deferral of access to personal data of third parties is allowed if the necessary data cannot be provided within thirty calendar days from the date of receipt of the request. In this case, the total period for resolving the issues raised in the request may not exceed forty-five calendar days.

The third party that submitted the request shall be notified of the postponement in writing with an explanation of the procedure for appealing such a decision.

The decision to postpone or deny access to personal data may be appealed to the Ukrainian Parliament Commissioner for Human Rights or the court.

## **Rights of the Personal Data Subject**

The Organization informs you of your rights as a subject of personal data, which are regulated by the Law of Ukraine *On Personal Data Protection*, in particular:

- 1) know about the sources of collection, location of your personal data, the purpose of their processing, location or place of residence (stay) of the owner or administrator of personal data or to give a corresponding order to obtain this information to persons authorized by him/her, except in cases established by law;
- 2) receive information on the terms and conditions for granting access to personal data, including information about third parties to whom his/her personal data is transferred;
- 3) have access to their personal data;
- 4) receive a response on whether his/her personal data is processed no later than thirty calendar days from the date of receipt of the request, except in cases provided for by law, and to receive the content of such personal data;
- 5) submit a reasoned request to the personal data owner with an objection to the processing of their personal data;
- 6) submit a reasoned request to change or destroy his/her personal data by any owner and administrator of personal data, if such data is processed illegally or is unreliable;
- 7) protect their personal data from unlawful processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision, as well as to protect against the provision of information that is inaccurate or discrediting to the honor, dignity and business reputation of an individual;
- 8) file complaints against the processing of their personal data to the Ukrainian Parliament Commissioner for Human Rights or to the court;
- 9) apply for legal remedies in case of violation of the legislation on personal data protection;
- 10) make reservations regarding the restriction of the right to process their personal data when giving consent;
- 11) withdraw consent to the processing of personal data;
- 12) know the mechanism of automatic processing of personal data;
- 13) be protected from an automated decision that has legal consequences for him/her.

To update, access, amend, block or delete your personal data, withdraw consent to the processing of personal data that you have provided to the Organization in accordance with this Policy, or if you have any comments, requests or claims regarding your personal data processed by the Organization, please contact the Organization by email [Berehynia.foundation@gmail.com](mailto:Berehynia.foundation@gmail.com).

## **Changes to the Policy**

This Policy may be amended and supplemented from time to time and without prior notice to the user, including in the event of changes in the requirements of the law.

In the event of significant changes to this Policy, the Organization will post a notice on the Website and indicate the date on which these changes will come into force. If you do not refuse to accept them in writing within the specified period, this will mean that you agree to the relevant changes to the Policy.

Please review the Policy from time to time to be aware of any changes or additions.