


PRIVACY POLICY

Date of the current version: **01 October 2024**

This Privacy Policy (further referred to as the "**Policy**") covers the collection, use, disclosure, transfer and storage of your personal data by Community Organisation "AZOV ONE" (further referred to as the "**Organisation**") in the following cases:

- When you use the Organisation's website at <https://strum.azov.one/> ("**Website**");
- In the course of electronic communication with the Organisation: via e-mail, feedback forms, chatbots, and other official means of online communication with the Organisation;
- In other cases whereby the processing of your data during the interaction with the Organization is not regulated by any other document.

Contents	Information about the Organization
	<p>Full name: Community Organisation "Azov One".</p> <p>Address of registration: apartment 49, Akademika Biletskoho Street 11, Kyiv, 03126, Ukraine.</p> <p>State Registration (EDRPOU) code: 45125011</p> <p>E-mail (general): info@azov.one</p> <p>Phone: +380 (93) 444-43-08</p> <p>Designated E-mail for data protection issues: privacy@azov.one</p>
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1. GENERAL PROVISIONS

1.1. In this Policy, the following terms are used:

o "**personal data**" means any information or a set of information pieces about a natural person (an individual) who is identified or can be specifically identified;

- o **"personal database"** means a named set of ordered personal data in an electronic format and/or in the format of personal data files;
- o **"data subject"** means a natural person (an individual) whose personal data is processed;
- o **"processing of personal data"** means any operation or set of operations, such as collection, recording, accumulation, storage, adaptation, modification, updating, use and dissemination (distribution, sale, transfer), anonymisation, and destruction of personal data;
- o **"consent of the data subject"** means a voluntary expression of the data subject's informed willingness to grant permission to process his/her personal data for the stated purpose of data processing, which is expressed in such a form that indicates that consent has been granted;
- o **"third party"** is any person (natural or legal), other than the data subject, Owner / Controller of personal data;
- o **"Cookies"** are small text files that the Website transmits to the browser of a device (computer, mobile phone, etc.) and are stored in the browser after visiting the Website;
- o **"GDPR"** is a European Union regulation titled the "Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (Data Protection Directive)".

All other terms in the Policy shall have the meaning defined by the applicable legislation of the European Union (including the General Data Protection Regulation) and Ukraine.

1.2. This Policy, as well as the activities of the Organisation related to the collection, processing, storage and other lawful actions regarding personal data, are regulated by:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- other applicable laws and regulations governing the protection of personal data in the respective jurisdictions.

The rights and obligations arising in connection with the processing of personal data of residents of foreign jurisdictions are subject to the applicable legislation and regulations governing the protection of personal data of residents of these states.

1.3. The Organisation is the Controller of personal data processed in connection with the visit of the Website and the use of the Website's technical tools. The Organisation has the right to authorize third parties to conduct the processing of personal data, as a whole or in part, on the basis of an agreement concluded in accordance with the requirements of the applicable law. The list of third parties that the Organisation may engage for the purpose of the processing of personal data and to whom the Organisation may disclose data is specified in Section 5 of this Policy.



2. CATEGORIES OF DATA SUBJECTS

2.1. For the purposes of this Policy, personal data subjects are divided into three categories:

User of the Website	Respondent	Donor
A user of the Website is any individual who has visited the Website.	The Respondent is a Website User who takes active steps that require the processing of personal data, such as using feedback forms and filling out registration forms on the Website.	A Donor is a Website User who has made a charitable donation using the technical tool available on the Website.

3. DATA PROTECTION AND WARRANTIES

3.1. The Organisation undertakes the following obligations:

- o to comply with good practice and regulatory requirements for the protection of personal data (including those stipulated by the General Data Protection Regulation);
- o to protect the rights of personal data subjects;
- o to prevent the risk of a breach of personal data processing security.

3.2. The placement of this Policy at the link specified in Clause 4.1. of this Policy is a notification of data subjects about the Owner (Controller), the scope and content of personal data collected in connection with the visit/use of the Website, the rights of data subjects, the purpose of collecting their personal data and third parties to whom such personal data may be transferred.

3.3. Your personal data are subject to erasure or destruction in the event of:

- o the expiry of their storage period specified in this Policy;
- o the termination of the legal relationship between the data subject and the Organisation, upon a personal written request of the data subject sent to the Organisation (if there are no legal grounds for data processing);
- o in other cases determined by the applicable legislation in the field of personal data protection.

3.4. The Organisation does not process personal data on racial or ethnic origin, political, religious or ideological beliefs, membership in political parties and trade unions, data about criminal records, as well as data pertaining to health, sexual life, biometric or genetic data, except in cases that are explicitly required by applicable law. The Organisation respects the security of your data and takes all necessary measures to ensure the protection of personal data.

4. PROCESSING OF PERSONAL DATA

4.1. Personal data may be processed by the employees of the Organization involved in public communication with Donors, Users, and Respondents (as defined in Section 2 above). This Policy covers, in particular, the processing of the following categories of personal data:

Category of data that may be processed	Purpose of processing	Legal grounds for the processing	Data subject	Processing time
1. Name and contact details: <ul style="list-style-type: none"> Last name, first name; Email address; Country and city of residence; Phone number; Other contact details (messenger data, links to social media pages). 	Processing of inquiries and appeals received by the Organisation from the Respondent.	Acceptance of the provisions of this Policy, and consent given by the data subject in line with Art. 6(1)(a) GDPR	Respondent	These data will be stored for up to three years after the termination of the relationship with the Organisation
	Protection of the rights of Organisation, Respondents, Users, Donors	The need to protect the legitimate interests of Organisation and other persons [Art. 6(1)(f) GDPR]	Respondent, Donor	
	Reporting on a charitable donation or participation in another charitable event of Organisation	Acceptance of the provisions of this Policy with an additional confirmation by the Donor. Consent is given by the data subject in line with Art. 6(1)(a) GDPR	Donor	
2. Payment details: <ul style="list-style-type: none"> name of the account holder; IBAN account number, other identifiers of the relevant payment service; 	Proper processing of charitable donations to the Organisation, preparation of reports on charitable activities.	The need to carry out a donation transaction initiated by the Donor. Processing is done to ensure the performance of the contract in line with Art. 6(1)(b) GDPR	Donor	This data will be stored for up to three years after the termination of the relationship with the Organisation
	Protection of the rights of Organisation, Respondents, Users, Donors	The need to protect the legitimate interests of Organisation and other persons [Art. 6(1)(f) GDPR]		
3. Photos and videos	Generating reports and publishing materials from online (including webinars and fundraisers) and offline events in which the Donor or Respondent was registered and participated.	Acceptance of the provisions of this Policy, and consent is given by the data subject in line with Art. 6(1)(a) GDPR	Respondent, Donor	This data will be stored for up to three years after the termination of the relationship with the Organisation
	Protection of the rights of Organisation, Respondents, Users, Donors	The need to protect the legitimate interests of Organisation and other persons [Art. 6(1)(f) GDPR]		

4. Technical information: Information about the device used to access the Website, such as: <ul style="list-style-type: none"> • IP address, browser version, operating system, device identifiers; • internal path and parameters of the operating system. • identifiers associated with Google and Meta advertising platforms. 	Providing access to the Website and correct display of information on the Website, ensuring cybersecurity of the Website.	Acceptance of the provisions of this Policy. Need to comply with a legal obligation [Art. 6(1)(c) GDPR]	User	This data will be stored for up to three years after the termination of the relationship with the Organisation
	Protection of the rights of Organisation, Respondents, Users, Donors	The need to protect the legitimate interests of Organisation and other persons in line with Art. 6(1)(f) GDPR		

5. PROCESSING OF DATA BY THIRD PARTIES

5.1. The Organisation may engage third parties to process personal data. These third parties are listed in the table below:

Third parties whom the Organisation may authorise with the processing of personal data	Personal data that may be transferred (in accordance with the categories set out in Section 4 of this Policy)	Purpose and grounds for the transfer of personal data
Hosting Provider of the Organisation's Website and information systems that support the operation of the Website (including service providers that collect and analyse data on the use of the Website)	Technical information	Optimising the display of the Website's content to improve the user experience, protecting the Website from cyber attacks and intruders, ensuring the correct and complete functioning of the Website. Transferred on the basis of your consent to this Policy to protect the legitimate interests of the Organisation and other persons
Payment service providers	Payment details	Proper processing of donations to the Organisation, reporting on the amount of funds raised and the activities of the Organisation. The need to execute a transaction to complete a charitable contribution.
Service providers that maintain the user databases of the Organisation's Website	Name and contact details	Storing data about donors for reporting (including individualised reporting), informing donors about the news of the Organisation and events organised by the Organisation.

This data is collected **only** with the prior consent of the Donor and upon the Donor's notification.

5.2. Please note that your personal data may also be disclosed in cases stipulated by law, in particular by court order, to prevent fraud and other crimes, etc. (For example, if there is an ongoing investigation into a payment fraud committed by a person who has stolen payment data). We also reserve the right to disclose your personal data to third parties in order to properly provide the services you have chosen, but only to the extent that these data are necessary to provide such services.

6. RIGHTS OF PERSONAL DATA SUBJECTS.

6.1. When visiting/using the Website, you have the right to:

- o receive from the Organisation additional information not specified in this Policy regarding the processing, conditions for granting access to your personal data, or give an appropriate guidance to receive this information to those persons that you authorize, except as provided by law;
- o have free access to your personal data;
- o receive a response to a request for processing your personal data in the manner and within the timelines specified by applicable law;
- o submit a justified request to object to the processing of your personal data, or to change, or to destroy your personal data if such data are deemed to be processed unlawfully or are inaccurate;
- o protect your personal data from unlawful processing and accidental loss, destruction, damage due to intentional concealment, failure to provide them or their untimely provision, as well as to protect against the provision of information that is inaccurate or discrediting the honour, dignity and business reputation of an individual;
- o withdraw your consent to the processing of personal data; and exercise other rights defined by the current legislation in the field of personal data protection.
- o object to the processing of personal data on the basis of your legitimate interests, or to the automated processing of data if this processing entails legal consequences for you.

6.2. You have the right to address any issues related to the collection, use, storage and other processing of your personal data to the relevant data protection authority in your jurisdiction.

6.3. If you have any questions about this Policy or if you have received any unsolicited electronic communication sent by the Organisation or purporting to be sent on behalf of the Organisation, please contact us directly at the designated email address: privacy@azov.one

7. COOKIE FILES

7.1. The Organisation's Website currently uses the data from such cookies:

Title.	Description	Storage period
XSRF-TOKEN	This cookie improves the security of the visitor's browsing experience by preventing cross-site request forgery.	During the session of using the Website

ssr-caching	The ssr caching cookie is set by WIX and indicates how the site was displayed.	Less than a minute
hs	The Wix platform installs this cookie for security purposes.	During the session of using the Website
svSession	The Wix platform installs this cookie to identify unique visitors and track the visitor's session on the site.	Less than two years

8. CHANGES TO THE PRIVACY POLICY

The Organisation reserves the right to review and amend the provisions of this Policy. The current version of this Policy is available on the Website at the [following link](#).

The updated Policy enters into force from the moment when it is posted on the Website.