

Privacy Policy of the website of CHARITABLE ORGANIZATION «CHARITABLE FOUNDATION «Kyiv Mohyla Foundation of Ukraine»

This Privacy Policy (hereinafter referred to as "the Policy") regulates the relations in the field of personal data protection of visitors to the website <https://charity.ukma.edu.ua> (hereinafter referred to as "the Website"), which belongs to the **CHARITABLE ORGANIZATION «CHARITABLE FOUNDATION «Kyiv Mohyla Foundation of Ukraine»** (hereinafter referred to as "the Foundation"), legal entity code **44997419**, located at the address: **6, Skovorody Street, office 45, 04070, Kyiv, Ukraine**, registered in accordance with the current laws of Ukraine, as well as other websites of the Foundation (if they are created).

1. GENERAL PROVISIONS.

1.1. The terms in the Policy are used in the following definitions:

- database of personal data is a named set of ordered personal data in electronic form and/or in the form of personal data files;
- personal data subject's consent is a voluntary expression of the individual's free will (subject to his/her awareness) regarding the granting of permission to process his/her personal data in accordance with the stated purpose of their processing, expressed in writing or in a form that allows concluding that the consent has been provided;
- confidential information is information about an individual, information access to which is restricted by an individual or a legal entity (except for subjects with official authority), as well as information recognized as such by law;
- personal data processing is any action or a set of actions, such as collection, registration, accumulation, storage, adaptation, change, renewal, use and distribution (circulation, sale, transfer), depersonalization, destruction of personal data, including using information (automated) systems;
- personal data includes details or a set of details about the individual, which is or may be explicitly identified;
- personal data subject is an individual whose personal data is processed;
- the third party is any person, except for the personal data subject, the owner or manager of personal data, and the Human Rights Ombudsman of the Verkhovna Rada of Ukraine, to whom the personal data owner or manager transfers personal data;
- cookies are small text files that are stored in a device's browser (computer, mobile phone, etc.) after visiting a website and are transmitted to the browser by the Website. More information about cookies can be found at the following link: <https://allaboutcookies.org/>.

All other terms in the Policy are used in accordance with their definitions as determined by the current laws of Ukraine, including international regulations ratified by Ukraine.

1.2. This Policy is developed to inform personal data or other confidential information subjects about the personal data or other confidential information processing procedures while visiting/using the Website and to ensure the protection of their personal data or other confidential information during such processing.

1.3. This Policy, as well as the Foundation's activities related to collecting, processing, storing, and other lawful actions regarding personal data or other confidential information about an individual, are regulated by:

- The Constitution of Ukraine;
- The Law of Ukraine "On Information" dated October 2, 1992, No. 2657-XII;
- The Law of Ukraine "On Personal Data Protection" dated June 1, 2010, No. 2297-VI;
- Other current regulatory legal acts of Ukraine, which regulate issues related to personal data and other confidential information protection.

In the legal relationships arising in the Foundation regarding the processing of personal data and other confidential information of residents of foreign jurisdictions, both national and international law, as well as national and international regulatory legal acts for the protection of personal data and other confidential information of residents of such countries, are applicable.

1.4. The Foundation is a holder of the personal data and other confidential information processed

in relation to visiting/using options of the Website. The Foundation has the right to fully or partially delegate the processing of personal data and other confidential information to third parties based on an agreement entered into in accordance with the requirements of current laws.

1.5. Under this Policy, an individual is considered to be a subject of personal data and other confidential information if they are a visitor to the Website, including using options available on the Website.

1.6. The Foundation guarantees that it:

- complies with proper practices and regulatory requirements for the protection of personal data and other confidential information;
- protects the rights of personal data and other confidential information subjects;
- prevents the risk of breaches in the security of personal data and other confidential information processing.

1.7. The purpose of personal data and other confidential information processing obtained during the functioning of the Website is to carry out the activities of the Foundation based on its Charter.

1.8. Posting this Policy at the link specified in paragraph 4.1. of this Policy serves as a notification to the subjects of personal data and other confidential information about the data holder, and content of personal data and other confidential information collected in connection with visiting/using the Website, the rights of such subjects, the purpose of collecting their personal data and other confidential information, as well as third parties to whom such personal data and other confidential information may be transferred.

2. PERSONAL DATA PROCESSING.

2.1. The Foundation may collect and process the following information about you:

- information you provide to the Foundation: the information about you, which you provide by using the Website and options of the Website, subscribing to email updates, making charitable contributions (donations) using options of the Website, communicating with the Foundation via options available on the Website, etc.;
- information about you collected by the Website and other systems: 1) when you visit the Website, third parties may collect some information about you and your visit, such as the type and version of your browser, the Website pages you visit, IP address, etc; 2) the Website may download cookies to your device; 3) when you contact the staff of the Foundation using the Website or other electronic communication tools;
- information about you collected on the Website by third parties through certain actions: information about you that you provide to third parties (e.g., Facebook, Google, Twitter) using social media exchange options available on the Website when you go from one page to another or by viewing materials containing links (opening) to other platforms (websites).

2.2. The way the Foundation processes your personal data and other confidential information depends on how you use the Website and interact with it. Some information may be provided directly by you when you use the Website or in other ways; information also may be collected and independently processed by the Foundation with automated technologies used on the Website.

Legal basis for personal data and other confidential information processing: the Foundation processes your personal data and other confidential information during your Website visit if 1) the Foundation has received your consent to such processing; 2) your personal data and/or other confidential information are necessary for the Foundation to enter into an agreement with you and fulfill it or to take actions preceding the conclusion of an agreement; 3) the Foundation has a legitimate interest in processing your personal data and other confidential information, and this legitimate interest does not outweigh your interests in protecting such personal data and other confidential information or your fundamental rights and freedoms; 4) in other cases defined by the current laws. In some cases, the Foundation may have a legal obligation to process your personal data and other confidential information or will process them for the preparation, submission of claims, complaints, lawsuits, and other similar legal documents, or for protection against such claims, complaints, lawsuits, etc.

2.3. Mechanisms of automated processing: the Foundation and third parties may use automated information processing technologies to process information in certain sections of the Website. The Foundation uses cookies to store content and settings, allowing the Foundation to process standard

information that your browser sends to certain websites you visit, such as your IP address, browser type and language, and the website you came from, the pages you visit and the links you click on the Website. Having such technical information helps the Foundation to improve the Website.

2.4. The Foundation may only use your personal data and other confidential information for the purposes defined in this Policy and in accordance with the current laws, including (but not limited to): 1) for the purpose of processing your request (inquiry) sent to the Foundation through the Website, 2) for the purpose of ensuring your ability to make charitable contributions (donations) using options available on the Website, 3) for the purpose of implementing other activities of the Foundation based on its Charter in accordance with the procedure established by the current laws.

2.5. The Foundation may accumulate personal data and other confidential information processed during your visit/use of the Website, including adding this data to the personal data database. Your personal data and other confidential information are stored in compliance with the requirements of the current laws on the protection of personal data and other confidential information.

2.6. The dissemination of your personal data and other confidential information about you is carried out solely with your consent or in cases defined by this Policy and the current laws.

2.7. The Foundation may partially publish user data on its Website in the “Reporting, Income” section.

2.8. Your personal data and other confidential information about you may be removed or destroyed in the following cases:

- the expiration of the 2-year retention period or any other period determined by current laws;
- the termination of legal relations between the subject of personal data and other confidential information and the Foundation, unless otherwise provided by law;
- in other cases as determined by the current laws in the field of personal data and other confidential information protection.

2.9. The Foundation does not process personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, membership in political parties and professional associations, criminal convictions, as well as data concerning health, sex life, biometric or genetic data, except in cases determined by the law.

3. RIGHTS OF THE PERSONAL DATA SUBJECTS.

3.1. When visiting/using the Website you have the following rights:

- to receive information from the Foundation, not covered by this Policy, regarding the processing and conditions of access to your personal data and other confidential information about you, or to authorize designated individuals to receive this information on your behalf, except in cases determined by the law;
- to have free access to your personal data and other confidential information about you;
- to receive a response to your request regarding the processing of your personal data and other confidential information about you in accordance with the procedure and timeframe determined by the current laws;
- to make a reasoned request objecting to the processing of your personal data and other confidential information about you, or regarding their alteration or destruction if such data and/or information are processed unlawfully or are inaccurate;
- to protection of your personal data and other confidential information about you from unlawful processing, accidental loss, destruction, damage due to intentional concealment, non-disclosure, or untimely provision, as well as protection against the provision of false information that harms the honor, dignity, and business reputation of an individual;
- to withdraw your consent to the processing of personal data and other confidential information about you;
- to exercise other rights provided by the current laws in the field of personal data and other confidential information protection.

3.2. You have the right to address questions related to the collection, use, storage, and other processing of your personal data and other confidential information about you to the Human Rights Ombudsman of the Verkhovna Rada of Ukraine, whom you can contact via the email address hotline@ombudsman.gov.ua. If you have any questions regarding this Policy or if you have received any unwanted electronic notifications sent by the Foundation or purportedly sent

on behalf of the Foundation, please contact the Foundation directly via the email address Foundation@ukma.edu.ua.

4. PRIVACY POLICY UPDATES.

4.1 The Foundation reserves the right to review and amend the provisions of this Policy. The current version of this Policy is posted on the Website: <https://charity.ukma.edu.ua>.