

## **PERSONAL DATA POLICY**

### **1. Definitions**

1.1 Automated processing of personal data means processing of personal data by means of computer equipment;

1.2 Blocking of personal data means temporary termination of personal data processing (except when processing is necessary to clarify personal data);

1.3 Information system of personal data means a set of personal data contained in databases, as well as information technology and technical means, providing their processing;

1.4 Anonymization of personal data means actions, as a result of which it is impossible to determine, without the use of additional information, whether the personal data belongs to a particular User or another subject of personal data;

1.5 Destruction of personal data means any actions, as a result of which personal data is destroyed irretrievably with impossibility of further restoration of personal data content in the information system of personal data and (or) physical media of personal data are destroyed;

1.6. Consultancy means Alliance Consultancy LLC, which is the administrator of the Website and Chatbot within the framework of services performance according to the Agreement No. 150422A dated April 01, 2022 on rendering services on elaboration and implementation of a cycle of measures aimed at realization of the main goals and objectives of the project "War Emergency Response to support internally displaced persons within Ukraine and Ukrainian refugees abroad - representatives of key population groups (HIV+, IDUs, SW, MSM, etc.)" (SoS Project 2\_Emegency Response) and disposer of personal data for the period of rendering the above services;

1.7. User means an individual-visitor of the Website or Chatbot;

1.8 Provision of personal data means actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

1.9 Processing of personal data means any action (operation) or a set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, change) , extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal and destruction of personal data;

1.10. Personal Data means any information relating directly or indirectly to an identified User or by which the User can be specifically identified;

1.11. Distribution of personal data means any actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or at familiarization of an unlimited circle of persons with personal data, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data by any other means;

1.12. Website means the HelpNow website, i.e. the aggregate of graphic and informational materials, as well as computer programs and databases, ensuring their accessibility on the Internet at the network address <http://Helpnow.aph.org.ua>;

1.13. Chatbot means HelpNow Chatbot, i.e. the aggregate of graphic and informational materials, as well as computer programs and databases, ensuring their accessibility on the Internet at <https://t.me/helpnowbot>;

1.14. Foundation means the "Public Health Alliance" International Charitable Foundation, which is the owner of the Website and Chatbot and the owner (controller) of personal data.

1.15. Other terms used in this Policy regarding personal data (hereinafter referred to as the Policy) shall be understood in accordance with their definitions provided in the applicable laws of Ukraine.

## **2. General Provisions**

2.1. This policy on personal data is prepared in accordance with the requirements of the Law of Ukraine "On Protection of Personal Data" dated 01.06.2010, № 2297-VI (text at link: <https://zakon.rada.gov.ua/laws/show/2297-17#Text>) and defines:

- procedure for personal data processing;
- composition of the processed personal data;
- purpose of personal data processing;
- procedure for protection of personal data;
- other information about realization of rights and obligations of the Foundation as an owner, Consultancy as a manager and User as a subject of personal data,

in connection with the User's visit to the Website or Chatbot or access to information, materials, services of the Website or Chatbot, management of the Website or Chatbot.

2.2 This Policy applies to all information that Consultancy and/or the Foundation may receive about Users.

## **3. Composition of personal data**

3.1 The following personal data of the User shall be processed on the Website/Chatbot:

- data provided by the User both when completing registration forms and as a result of providing access to information, materials, services of the Website or Chatbot;
- cookie files;
- IP-addresses;
- Internet browser settings (User-agent).

The above data hereinafter in the text of the Policy are united by the general concept of personal data.

3.2 Only personal data (such as full name, login and password, e-mail address, contact phone number, date of birth, gender, etc.) voluntarily provided by the User as a subject of personal data

for the purpose of visiting the Website or Chatbot or providing access to the information, materials, services of the Website or Chatbot are collected on the Website/Chatbot.

3.3 No personal data regarding racial or ethnic origin, political, religious or philosophical beliefs, membership of political parties or trade unions, criminal convictions, as well as data regarding health, sex life, biometric or genetic data, shall be processed on the Website/Chatbot.

3.4 The Website/Chatbot also collects and processes anonymous visitor data using Internet statistics services (Yandex Metrika and Google Analytics, etc.). Data may contain information about the connection, traffic, User's browser, as well as the date, time, duration of being online and being on the Website/Chatbot.

#### **4. Purpose of Personal Data Processing**

4.1 The purpose of User's personal data processing is visiting of the Website or Chatbot by the User and providing him/her access to the information, materials, services of the Website or Chatbot, proper management of the Website or Chatbot.

4.2. User's anonymized data collected via Internet statistic services are used for collecting information about User's activities on the Website/Chatbot, improving the quality and content of their information, materials and services.

#### **5. Legal basis for personal data processing**

5.1 The User's personal data shall be processed only when they are filled in and/or submitted by the User independently through special forms located on the Website/Chatbot. By filling in the respective forms and/or sending his/her personal data, the User expresses his/her consent to this Policy.

5.2 The anonymized data of the User shall be processed in case if it is allowed in the settings of the User's browser (cookie saving and use of JavaScript technology is enabled).

5.3 Visiting the Website / Chatbot by the User, using their services, other actions specified in this section indicate acceptance of this Policy by the User, the explicit consent of the User to the processing of his/her respective personal data by Consultancy and Foundation, as well as familiarization of the User with his/her rights as a subject of personal data in accordance with Article 8 of the Law of Ukraine "On Protection of Personal Data", in particular, that the subject of personal data ( the User) has the following rights:

- To know the sources of collection, the location of his/her personal data, the purpose of its processing, the location or residence of the owner or disposer of the personal data or to give an appropriate instruction to obtain this information to persons authorized by him/her, except in cases established by law;
- To obtain information about the terms of access to personal data, in particular information about third parties to which his/her personal data is transferred;
- To have access to his/her personal data;
- To receive a reply as to whether his personal data is processed no later than thirty calendar days from the date of receipt of the request, except in cases prescribed by law, and to receive the content of such personal data;

- To submit a motivated request to the personal data owner objecting to processing of his/her personal data;
- To submit a reasoned request for modification or destruction of his/her personal data by any owner and disposer of personal data, if such data is processed unlawfully or is unreliable;
- To protect his/her personal data against illegal processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or late provision, as well as to protect against providing information that is inaccurate or discrediting the honor, dignity and business reputation of an individual;
- To apply with complaints about the processing of his/her personal data to the Ombudsman of the Verkhovna Rada of Ukraine or to the court;
- To apply legal remedies in case of violation of the legislation on personal data protection;
- To make reservations regarding the restriction of the right to process his/her personal data when granting consent;
- To withdraw the consent to the processing of personal data;
- To know the mechanism of automatic processing of personal data;
- To be protected against automated decision that has legal consequences for him/her.

## **6. Term of personal data processing**

6.1 The term of personal data processing is unlimited. The User may withdraw his/her consent to the processing of personal data at any time by sending an email to [helpnowua@gmail.com](mailto:helpnowua@gmail.com) marked "Withdrawal of consent to the processing of personal data".

6.2 Once the subject of personal data is not a User due to the deletion of his/her account, his/her personal data is also automatically deleted.

## **7. Interaction with third parties and other services**

7.1 Some services of the Website/Chatbot are provided through integration with services provided by third parties for the User's convenience. The User, by committing the actions specified in clause 5.3. of this Policy, gives consent to the engagement of such third party services and the provision to them of information, including personal data necessary for the relevant authentication and use of their services, the processing of such information by the Consultancy / Foundation and the relevant third parties.

7.2 The pages of the Platform may also contain codes from other Internet resources and third parties (for example, social networking plugins), through which the Website/Chatbot services are not provided, as a result of which such Internet resources and third parties receive the User's data. If the User does not want these resources and third parties to have access to his/her personal data, the User can log out of his/her account, clear the cookies (through his/her browser).

7.3 The Website/Chatbot may contain links to other websites. If you link to other websites, this Policy will not apply to such websites. Consultancy/Foundation has no control over and is not responsible for the privacy and personal data policies or practices of any other websites. Therefore, Users are advised to review the privacy and personal data policies of each website before submitting any personal data.

## **8. Protection of Personal Data**

8.1 The security of personal data processed by Consultancy/Foundation is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

8.2 The Consultancy/Foundation shall ensure the preservation of personal data and shall take all possible measures to prevent access to personal data by unauthorized persons.

8.3 The Consultancy/Foundation provides access to information and personal data only to authorized employees who have agreed to ensure the confidentiality of such information and data.

8.4 Personal data of the User will not be transferred to third parties or distributed, except in cases related to the execution of the requirements of applicable law.

## **9. Final provisions**

9.1 The User may access, update, modify, block or delete his/her personal data, withdraw his/her consent to the processing of personal data provided in accordance with this Policy, express any comments, suggestions or complaints, receive any clarifications to the questions regarding the processing of his/her personal data by contacting the Consultancy/Foundation via email [helpnowua@gmail.com](mailto:helpnowua@gmail.com).

9.2 This Policy may be amended and supplemented without prior notice to the User, including when the requirements of applicable law change.

9.3 This Policy, as well as any amendments and additions to it, shall become effective upon posting on the Website/Chatbot.

9.4 This Policy is valid indefinitely until it is replaced by a new version.