GENERAL PERSONAL DATA PROTECTION POLICY

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

OSINT for Ukraine is committed to protecting the privacy and security of your personal information. This privacy policy provides information regarding the data we collect from you and how we process this data. In collecting this information, we are acting as a data controller. By virtue of the 2016/679 Regulation 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) and the national law N.125(I)/2018 as amended we are required to provide you with information about us, about how and why we use your data and about the rights you have over your data.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used in a transparent way, by providing you information on how your data will be used.
- Used fairly, meaning that the processing of your data matched the description given to you.
- Used lawfully in accordance with at least one legal basis as defined in GDPR Certification of Data Protection System.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have informed you about.
- Kept securely.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

We collect, store, and use the following categories of personal data:

- The information you provide when "Applying for a position", including organization, title/position, first name, last name, job title/professional background, telephone number, mobile number, email address, address, city and postal code.
- Communication information. When you send us an e-mail or other communication, we retain that communication in order to process your enquiries and respond to your requests.

Since we are a regranting administrator, we may share your data and process them with third parties in the context of the activities of the Organization.

The legal basis of the processing operations carried out for the above purposes under 1, 3, 5 and 6 is the fulfillment of the legitimate interests of the (joint) Data Controllers [Article 6(1)(f) GDPR], which consist in the correct and effective implementation of the Programme and its objectives.
The processing of personal data for the fulfillment of the purposes set out in points 2 and 4 above is carried out for the performance of a contract to which the Data Subject is a party [Article 6(1)(b)(b) of the GDPR].

In cases of data processing for the purpose of monitoring and promotion of the projects being implemented (above under 3), the legal basis is, where applicable, also the consent of the Data

Subjects [Article 6(1)(a) GDPR], which is collected after provision of specific information to the Data Subjects regarding their rights etc.

4. **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about you from the following sources:

- You, directly.
- From our online platform.

5. **HOW WE WILL USE INFORMATION ABOUT YOU**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the collaboration we have entered into with you.
- Where we need to provide you with the information that you request from us.
- Where we need to comply with a legal obligation.
- We may in some circumstances rely on your consent. In those circumstances, we will specifically ask whether you agree to us using your data in specified ways. You can withdraw your consent and ask us to delete your information at any time – please see section 11.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. As you have shown interest in becoming a member or attending our events, we rely on this legal basis to send you information and updates about future events that may be of interest to you. If you DO NOT wish to receive this information, you have the right to object to this at any time, by contacting our officer, responsible for data protection, at contact@osintforukraine.com or by clicking the unsubscribe link at the bottom of our emails.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

6. **AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

7. **DATA SHARING**

We may share your data with third parties, including lead partners in projects, donors and third-party service providers, where it is necessary to administer the collaboration relationship with you. We may also share your information where this is required by law.
We use data processors, such online registration forms to help facilitate the organization of activities.

8. **TRANSFERRING INFORMATION OUTSIDE THE EU**

When we transfer personal data to countries outside the EEA, we make such transfers to a recipient (i) located in a country that provides an adequate level of protection for personal data or (ii) under appropriate safeguards in accordance with the provisions of applicable data protection laws (e.g. under an agreement in the form of standard data protection clauses adopted by the European Commission), the form of which is available at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en. In some cases, we

may carry out such transfers where we have obtained the express consent of such data subjects to the proposed transfer, given that the data subject has been informed of the potential risks of such a transfer (in the absence of an adequate decision and appropriate safeguards).
If you have any questions about this or need any further information please contact our officer, responsible for data protection, at contact@osintforukraine.com.

9. **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees who need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.
Details of these measures may be obtained from the officer responsible for data protection.
We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. **DATA RETENTION**

We will retain your personal information only for as long as we need it or until you withdraw your consent, (in those instances where we process your information based on your consent) or you object to processing when exercising your rights in accordance with section 11 below. You can contact our officer responsible for data protection at contact@osintforukraine.com to find out more about our retention times.

11. **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

Under certain circumstances, by law you have also the right to:

- **Request access to your personal information** (commonly known as a “data subject access request”. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party** but only for information processed by automated means and where the processing is based on your consent or on contract.

- **Right to withdraw consent at any time for processing for any purpose for which you have given consent**.

If you want to exercise any of the above rights, please contact our officer responsible for data protection at contact@osintforukraine.com.

12. **DATA PROTECTION OFFICER**

We have appointed an officer, responsible for data protection, to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact our officer, responsible for data protection, at contact@osintforukraine.com.
You have the right to make a complaint at any time to the Autoriteit Persoonsgegevens. You can find out more about the Autoriteit Persoonsgegevens at https://www.autoriteitpersoonsgegevens.nl/.

13. **AMENDMENT OF THIS POLICY**

OSINT FOR UKRAINE reserves the right to regularly review and amend the present Policy, either in whole or in part, when necessary. Users are advised to consult our website to make sure that they are aware of the policy's most recent version.

Appendix A
The data collected in the "Member and Staff Registration Form" includes: email address, full name and surname, date of birth, phone number, and home address. This data is stored on Microsoft SharePoint.