

**PROCESSING OF PERSONAL DATA
VIA STICHTING BELARUS SOLIDARITY FOUNDATION
WEBSITES AND MOBILE APPLICATIONS**

1st September 2020

Stichting Belarus Solidarity Foundation (hereinafter "**SBSF**") collects and process the Users' Personal data for the purposes of due access to the Websites/Mobile Apps as well as provision SBSF service, charity and help to the Users.

Depending on the circumstances of data collection and processing different legal entities affiliated to SBSF are controllers and processors of the Users' Personal data.

To receive information on SBSF acting as data controller or processor please send a request to SBSF data protection personnel at privacy@bysol.org (the response may be provided exclusively in respect of the requesting individual).

SBSF does not collect or process Personal data of the minor under 16 years old.

SBSF does not collect or process the following categories of Personal data: racial or ethnic origin, religious or philosophical beliefs, convictions, as well as health related data, sex life or sex orientation data, biometric or genetic data of Users ("sensitive personal data").

SBSF ensures to take all appropriate measures on Personal data protection considering provisions of applicable law on personal data protection (including GDPR provisions if applicable) and the specifics of SBSF activities.

Contacts

For any questions on Personal data protection please send request or complaint to SBSF data protection personnel at privacy@SBSF-borjomi.com.

Categories of Personal data collected and processed by SBSF, purposes and legal grounds of Personal data collecting and processing

The scope, method, purpose and legal ground for collecting and processing of Personal Data by SBSF may vary depending on the way of use of SBSF Websites/Mobile Apps by the Users as well as on the scope of Services requested by the Users.

There are the following legal grounds for collecting and processing of Personal data by SBSF via use of the Websites/Mobile App by the Users:

- consent to collection and processing of Personal data;
- fulfillment of SBSF contractual obligations;
- compliance with legal requirements applicable to SBSF;
- SBSF legal interest.

SBSF collects and processes Personal data of the Users' of the Websites/Mobile Apps for the following purposes:

- applying for SBSF services, charity and help, managing such requests, providing SBSF services, charity or help;
- providing responses to search and information requests of users about SBSF services, charity and help;
- enabling conduction of SBSF social programs;
- managing subscriptions to newsletter on SBSF social activity;

- use of feedback forms on SBSF Websites/Mobile Apps;
- providing information exchange from the Websites/Mobile Apps via e-mail or social networks;
- conducting social marketing researches and analysis of SBSF services, charity and help;
- improving operations of SBSF Websites/Mobile Apps;
- providing information on SBSF services, charity and help (newsletters, information on social promotions and other events).

Websites/Mobile Apps enabling applies of SBSF services, charity and help		
Categories of Personal Data	Purposes	Legal grounds
name, surname, middle name, email address, mobile telephone number, city and state of residence; bank cards data (cardholder's name, card number, card expiry date and CVV-code).	<ul style="list-style-type: none"> • applying for SBSF services, charity and help, managing such requests; • enabling conduction of SBSF social activity programs; • use of feedback forms on SBSF Websites/Mobile Apps. 	consent to collection and processing of Personal data, fulfillment of contractual obligations of SBSF
account data	<ul style="list-style-type: none"> • charity and other financial help payments 	consent to collection and processing of Personal data, fulfillment of contractual obligations of SBSF
"cookies", technical data	<ul style="list-style-type: none"> • tracking the preferences of the Users to provide customized information about SBSF services, charity and help; • providing responses to search and information requests of users about SBSF services, charity and help; • improving operations of SBSF Websites/Mobile Apps. 	consent to collection and processing of Personal data
anonymized data	<ul style="list-style-type: none"> • conducting social marketing researches and analysis of trends for improvement of SBSF services, charity and help. 	SBSF legal interest
Websites/Mobile Apps for informational and social marketing purposes		
name, surname, middle name, email address, mobile telephone number, city and country of living	<ul style="list-style-type: none"> • use of feedback forms on SBSF Websites/Mobile Apps; • providing information on SBSF services, charity and help (newsletters, information about the SBSF activities, 	consent to collection and processing of Personal data

	social marketing and events);	
"cookies", technical data	<ul style="list-style-type: none"> • providing information exchange from SBSF Websites/Mobile Apps via e-mail or social networking; • tracking the preferences of the Users to provide customized information about SBSF services, charity and help; • providing responses to search and information requests of users about SBSF services, charity and help. 	consent to collection and processing of Personal Data
anonymized data	<ul style="list-style-type: none"> • conducting social marketing researches and analysis of SBSF services, charity and help. 	SBSF legal interest

It's necessary to collect and process the Users' Personal data for use of SBSF Websites/Mobile Apps as well as for provision of SBSF services, charity and help.

There is a log-in option for the Websites/Mobile Apps via social networks managed by third parties (depending on the functionality and internal settings of the Websites/Mobile Apps). By making such an entry, the Users hereby agree to provide SBSF with the share access to Personal data to the scope requested under the settings on Personal data in the respective social network.

SBSF processes each category of Personal data for the period necessary to fulfill each of the purposes hereto. After that such Personal data would be deleted. In any case, SBSF is entitled to store personal data for a period necessary for fulfillment of its obligations in respect of the Users for providing SBSF services, charity and help as well as to meet the obligations required by the applicable law.

Users' rights related to Personal data

- right of access to Personal data;
- right to rectification of Personal data;
- right of access to methods of processing of Personal data;
- right to be informed on Personal data breaches;
- right on limited transferring of Personal data to third parties;
- right to revoke the consent to collection and processing of Personal data;
- right to restriction on collection and processing of Personal data;
- right to erasure of Personal data.

Please submit a request or complaint on Personal data to the SBSF data protection personnel at: privacy@bysol.org or contact the competent data protection authorities.

Transfer of Personal data to third parties

SBSF transfers Personal data to third parties (including cross-border transfer of Personal data) exclusively in the scope necessary for the purposes of collection and processing of Personal data for which such Personal data was initially collected by SBSF.

SBSF transfers Personal data exclusively in case of necessity, in a minimum scope, for a minimum period of time, which is necessary under such transfer.

To due provision of Services, ensuring access to the Websites/Mobile Apps as well as improving of providing of such Services and access SBSF may transfer Personal data to:

- affiliated legal entities of SBSF;
- partners of SBSF;
- subcontractors of SBSF;
- third parties, in particular to state authorities (in case of compliance with the legislative provisions);
- third parties in case of any legal procedures related to reorganization of SBSF.

SBSF should take all necessary legal, organizational and technical measures to ensure protection of Personal data.
