



Data Protection Policy
CO «CF «ADRA Ukraine »

Kyiv – 2025

Purpose

The Adventist Development and Relief Agency Ukraine (ADRA Ukraine) is committed to conducting its business in accordance with all applicable data protection laws and regulations. This policy sets out the expected behaviors of ADRA Ukraine employees and third parties in relation to the collection, use, retention, transfer, disclosure, and destruction of personal data.

Personal data is any information (including opinions and intentions) which relates to an identified or identifiable natural person (the Data Subject). It is subject to certain legal safeguards and other regulations, which impose restrictions on how organization may process personal data.

An organization that handles personal data and makes decisions about its use is known as a Data Controller. ADRA Ukraine, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may expose ADRA Ukraine to complaints, regulatory action, fines and/or reputational damage. ADRA Ukraine's leadership is fully committed to ensuring continued and effective implementation of this policy, and expects all ADRA Ukraine employees, associates, volunteers, contractors and other third parties to share in this commitment.

Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction. This policy has been approved by the ADRA Ukraine ADCOM (Administrative Committee).

Scope

This policy applies to ADRA Ukraine and all locations in which personal data is processed by the organization:

- In the context of the organization's operation and activities
- For the provision or offer of goods or services
- For the purpose of marketing and fund-raising activities

If there are conflicting requirements in this policy and national law, please consult with the ADRA Ukraine Data Protection staff e.g. Protection Specialist, IT Specialist, Head of Legal Department or MEAL Coordinator.

Definitions

Anonymization

Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) by any means or by any person.

Consent

Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data Breach

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Data Controller

An individual or organization which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Processor

An individual or organization which processes personal data on behalf of a data controller.

Data Protection

The process of safeguarding personal data from unauthorized or unlawful disclosure, access, alteration, processing, transfer or destruction.

Data Subject

Anyone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

Encryption

The process of converting information or data into code, to prevent unauthorized access.

Personal data

Any information (including opinions and intentions) which relates to an identified or identifiable natural person.

Personal data breach

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored, or otherwise processed.

Processing

Any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means. Operations performed may include collection, recording, organization, structuring, storage, backing-up data, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor

A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

Profiling

Any form of automated processing of personal data where personal data is used to evaluate specific or general characteristics relating to a Data Subject. In particular to analyze or predict certain aspects concerning that individual's performance at work, economic situations, health, personal preferences, interests, reliability, behavior, location or movement.

Pseudonymization

Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) without a "key" that allows the data to be re-identified.

Special Categories of Data

This relates to:

- personal data revealing **racial or ethnic origin**;
- personal data revealing **political opinions**;
- personal data revealing **religious or philosophical beliefs**;
- personal data revealing **trade union membership**;
- **genetic data**;
- **biometric data** (where used for identification purposes);
- data concerning **health**;
- data concerning a person's **sex life**; and;
- data concerning a person's **sexual orientation**.

Staff

Individuals who work part-time or full-time for ADRA Ukraine under a contract of employment. Includes employees, temporary employees, and associates and independent contractors that may be involved in the processing of personal data.

Third Party

An external organization with which ADRA Ukraine exchanges personal data, or that processes data on behalf of ADRA Ukraine.

Training and Awareness

Senior management within ADRA Ukraine must ensure that all staff are aware of and comply with the contents of this policy. In addition, management must ensure that all third parties engaged in processing personal data on their behalf (i.e., their Data Processors) are aware of and comply with the contents of this policy.

Assurance of such compliance must be obtained from all third parties, whether organizations or individuals, prior to granting them access to personal data controlled by ADRA Ukraine.

Data Protection by Design

To ensure that all data protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, each new system or process must go through an approval process before continuing.

Compliance Monitoring

The Data Protection staff will devise a plan with a schedule for correcting any identified deficiencies within a defined and reasonable time frame. Any major deficiencies identified will be reported to and monitored by the ADRA Ukraine Senior management.

Data Protection Principles

ADRA Ukraine requires that all staff and third parties comply with relevant national laws regarding the following data protection principles that govern the use of personal data for which ADRA Ukraine is the

data controller.

- **Principle 1: Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.** This means, ADRA Ukraine must tell the Data Subject what processing will occur (transparency), the processing must match the description given to the Data Subject (fairness), and it must be for one of the purposes specified in the applicable Data Protection regulation (lawfulness).
- **Principle 2: Personal data shall be collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes.** This means ADRA Ukraine must specify exactly what the Personal data collected will be used for and limit the Processing of that Personal data to only what is necessary to meet the specified purpose.
- **Principle 3: Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.** This means ADRA Ukraine must not store any Personal data beyond what is necessary.
- **Principle 4: Personal data shall be accurate and, kept up to date.** This means ADRA Ukraine must have in place processes for identifying and addressing out-of-date, incorrect, and redundant Personal data.
- **Principle 5: Personal data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal data is Processed.** This means ADRA Ukraine must, wherever possible, store personal data in a way that limits or prevents identification of the Data Subject.
- **Principle 6: Personal data shall be processed in a manner that ensures appropriate security of the Personal data, including protection against unauthorized or unlawful processing, and against accidental loss, destruction, or damage.** This means that ADRA Ukraine must use appropriate technical and organizational measures to ensure the integrity and confidentiality of Personal data is maintained at all times.
- **The Accountability Principle: The Data Controller shall be responsible for and be able to demonstrate compliance.** This means that ADRA Ukraine must demonstrate that the six Data Protection Principles (outlined above) are met for all personal data for which it is responsible.

Data Collection

Data Sources

Personal data may only be collected from the Data Subject themselves unless one of the following applies:

- The nature of the business purpose necessitates collection of the personal data from other persons or bodies.
- The collection must be carried out under emergency circumstances in order to protect the vital interests of the Data Subject or to prevent serious loss or injury to another person.
- If personal data is collected from someone other than the Data Subject, the Data Subject must be informed of the collection unless one of the following apply:
 - The Data Subject has received the required information by other means. For example, they have already been informed by a Third Party that their details will be shared with ADRA Ukraine.
 - The information must remain confidential due to a professional secrecy obligation
 - A national law expressly provides for the collection, processing, or transfer of the personal data.

Where it has been determined that notification to a Data Subject is required, notification should occur promptly, but in no case later than:

- One calendar month from the first collection or recording of the personal data
 - At the time of first communication if used for communication with the Data Subject
 - At the time of disclosure if disclosed to another recipient
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Lawful Bases for Data Use and Data Processing

ADRA Ukraine uses the personal data for the following broad purposes:

- The general running and administration of ADRA Ukraine
- To provide services to ADRA Ukraine donors and beneficiaries
- The ongoing administration and management of donor services.
- The ongoing management of volunteers, advocates, and supporters
- For accountability back to funders and donors

The use of a Data Subjects information should always be considered from their perspective and whether the use will be within their expectations or if they are likely to object.

ADRA Ukraine will process personal data in accordance with all applicable laws and applicable contractual obligations. More specifically, ADRA Ukraine will not process any personal data unless at least one of the following requirements are met:

- Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the data controller is subject
- Processing is necessary in order to protect the vital interests of the Data Subject or of another natural person
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller
- Processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party (except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject, in particular where the Data Subject is a child)
- The Data Subject has given consent to the processing of their personal data for one or more specific purposes

Consent will only be obtained where none of the other lawful bases for processing apply.

Obtaining Consent

Personal data must be obtained only by lawful and fair means and, where required, with the knowledge and consent of the individual concerned.

ADRA Ukraine will ensure the following is in place when obtaining consent:

- Ensure the request for consent is presented in a manner which is clearly distinguishable from any other matters, is made in an intelligible and easily accessible form, and uses clear and plain language.
- Ensure the consent is freely given (i.e., is not based on a contract that is conditional to the

- processing of personal data that is unnecessary for the performance of that contract).
- Document the date, method and content of the disclosures made, as well as the validity, scope, and volition of the consents given.
- Provide the ability for a Data Subject to withdraw their consent at any time, ensuring that the consent is as easy to withdraw as it was to provide in the first place

Data Subjects must be provided with information as to the purpose of the processing of their personal data at the point at which the information is collected.

Data Processing in any circumstance where Consent has not been gained for the specific Processing in question

In addition to ensuring that there is a lawful bases for the new processing any data, ADRA Ukraine will address the following additional conditions to determine the fairness and transparency of any processing beyond the original purpose for which the personal data was collected:

- Any link between the purpose for which the personal data was collected and the reasons for intended further processing.
- The context in which the personal data has been collected, in particular regarding the relationship between Data Subject and the data controller.
- The nature of the personal data, in particular whether special categories of data are being processed, or whether personal data related to criminal convictions and offences are being processed.
- The possible consequences of the intended further processing for the Data Subject.
- The existence of appropriate safeguards pertaining to further processing, which may include encryption, anonymization or pseudonymization.

Special Categories of Data

ADRA Ukraine will only process special categories of data (also known as sensitive data) where the Data Subject expressly consents to such processing or where one of the following conditions apply:

- The processing relates to personal data which has already been made public by the Data Subject
- The processing is necessary for the establishment, exercise, or defense of legal claims
- The processing is specifically authorized or required by law, including obligations arising out of agreements with government entities.
- The processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent.
- Further conditions, including limitations, based upon national law related to the processing of genetic data, biometric data or data concerning health

Where special categories of data are being processed, ADRA Ukraine will adopt additional protection measures. ADRA Ukraine branch offices may also adopt additional measures to address local custom or social expectation over the processing of special categories of data.

Children's Data

Children under the age of 18 or potentially as young as 13 in certain jurisdictions are unable to consent to the processing of personal data. Consent must be sought from the person who holds parental responsibility over the child. However, it should be noted that where processing is lawful under other grounds, consent need not be obtained from the child or the holder of parental responsibility.

Should ADRA Ukraine foresee a need for obtaining parental consent for information society services offered directly to a child, guidance and approval must be obtained from the Data Protection staff before any processing of a child's personal data may commence.

Data Quality

ADRA Ukraine will adopt all necessary measures to ensure that the personal data it collects, and processes is complete and accurate in the first instance and is updated to reflect the current situation of the Data Subject. The measures adopted by ADRA Ukraine to ensure data quality include:

- Correcting personal data known to be incorrect, inaccurate, incomplete, ambiguous, misleading, or outdated, even if the Data Subject does not request rectification
 - Keeping personal data only for the period necessary to satisfy the permitted uses or applicable statutory retention period
 - The removal of personal data if in violation of any of the data protection principles or if the personal data is no longer required.
 - Restriction, rather than deletion of personal data, insofar as:
 - A law prohibits erasure.
 - Erasure would impair legitimate interests of the Data Subject.
 - The Data Subject disputes that their personal data is correct, and it cannot be clearly ascertained whether their information is correct or incorrect.
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Profiling and Automated Decision-Making

ADRA Ukraine will only engage in profiling and automated decision-making where it is necessary to enter into, or to perform, a contract with the Data Subject or where it is permitted by law. Where ADRA Ukraine utilizes profiling and automated decision-making, the Data Subject will be given the opportunity to object. ADRA Ukraine must also ensure that all profiling and automated decision-making relating to a Data Subject is based on accurate data.

Digital Marketing

ADRA Ukraine only participates in digital marketing where it is permitted by law and in line with ADRA's Privacy Policy.

Data Retention

To ensure fair processing, personal data will not be retained by ADRA Ukraine for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed and in accordance with national and/or local laws.

All personal data should be deleted or destroyed as soon as possible where it has been confirmed that there is no longer a need to retain it.

Data Protection

ADRA Ukraine will adopt physical, technical, and organizational measures to ensure the security of personal data. This includes the prevention of loss or damage, unauthorized alteration, access or processing, and other risks to which it may be exposed by virtue of human action or the physical or natural environment.

A summary of the personal data related security measures is provided below:

- Prevent unauthorized persons from gaining access to data processing systems in which personal data are processed.
 - Prevent persons entitled to use a data processing system from accessing personal data beyond their needs and authorizations.
 - Ensure that personal data in the course of electronic transmission during transport cannot be read, copied, modified or removed without authorization.
 - Ensure that access logs are in place to establish whether, and by whom, the personal data was entered into, modified on or removed from a data processing system.
 - Ensure that in the case where processing is carried out by a data processor, the data can be processed only in accordance with the instructions of the data controller
 - Ensure that personal data is protected against undesired destruction or loss
 - Ensure that personal data collected for different purposes can and is processed separately.
 - Ensure that personal data is not kept longer than necessary
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Data Protection Training

All ADRA Ukraine staff have their responsibilities under this policy outlined to them as part of their staff induction training. In addition, regular data protection training and awareness is provided via online training and other communication to all staff.

Training and guidance consist of, at a minimum, the following elements:

- The data protection principles.
- Everyone's duty to use and permit the use of personal data only by authorized persons and for authorized purposes.
- The need for, and proper use of, the forms and procedures adopted to implement this policy
- The correct use of passwords, security tokens and other access mechanisms.
- The importance of limiting access to personal data, such as by using password protected screen savers and logging out when systems are not being attended by an authorized person.
- Securely storing manual files, print outs and electronic storage media.
- The need to obtain appropriate authorization and utilize appropriate safeguards for all transfers of personal data outside of the internal network and physical office premises.
- Proper disposal of personal data by using secure shredding facilities.
- Any special risks associated with particular departmental activities or duties.

Transfers to third parties

ADRA Ukraine will only transfer personal data to, or allow access by, third parties when it is assured that the information will be processed legitimately and protected appropriately by the recipient.

Where third party processing takes place, ADRA Ukraine will first identify if, under applicable law, the third party is considered a Data Controller, or a Data Processor of the personal data being transferred.

Where the third party is deemed to be a Data Controller, ADRA Ukraine will enter into an appropriate agreement with the Controller to clarify each party's responsibilities in respect to the personal data transferred.

Where the third party is deemed to be a Data Processor, ADRA Ukraine will enter into an adequate processing agreement with the Data Processor. The agreement must require the Data Processor to protect the personal data from further disclosure and to only process personal data in compliance with ADRA Ukraine instructions. In addition, the agreement will require the Data Processor to implement appropriate technical and organizational measures to protect the personal data as well as procedures for providing notification of personal data breaches.

When ADRA Ukraine is outsourcing services to a Third Party (including Cloud Computing services), they will identify whether the third party will process personal data on its behalf and whether the outsourcing will entail any third party transfers of personal data. In either case, it will make sure to include adequate provisions in the outsourcing agreement for such processing and third country transfers.

Where appropriate, ADRA Ukraine will retain the right to conduct audits of processing of personal data performed by third parties, especially in respect of technical and organizational measures they have in place.

Complaints

Handling complaints about the Processing of their personal data should be made in accordance to the Complaint and Feedback Mechanism (CFM) Policy of ADRA Ukraine. An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case.

The responsible Data Protection staff will inform the Data Subject of the progress and the outcome of the complaint within a reasonable period.

Breach Reporting

Any individual who suspects that a Personal Data Breach has occurred due to the theft or exposure of personal data must immediately notify, providing a description of what occurred.

ADRA Ukraine will investigate all reported incidents to confirm whether or not a Personal Data Breach has occurred. If a Personal Data Breach is confirmed, ADRA Ukraine will determine the criticality and quantity of the personal data involved. For Personal Data Breaches that could cause potential harm to individuals, the Data Protection staff will initiate and coordinate and manage the Personal Data Breach response.

Publication

This policy is available to all ADRA Ukraine employees and associates. All employees and associates are requested to provide their signature to indicate that they have read and understand the policy.

President



The image shows a handwritten signature in blue ink next to an official circular stamp. The stamp is blue and contains the following text: "БЛАГОДІЙНА ОРГАНІЗАЦІЯ" (Charitable Organization) at the top, "АДВЕНТИСТСЬКЕ АГЕНТСТВО ДОПОМОГИ ТА РОЗВИТКУ В УКРАЇНІ" (Adventist Agency for Assistance and Development in Ukraine) in the center, and "ІДЕНТИФІКАЦІЙНИЙ КОД 38756307" (Identification Code 38756307) at the bottom.

Rutkovskyi L.B.