### Privacy Policy of the Conflict Foundation

#### **General information**

This version of the Privacy Policy of the Conflict Foundation has been in force since 1 April 2023. The administrator of personal data is the Conflict Foundation with its registered office in Warsaw, 02-557, al. Niepodległości 118/89; NIP: 1132917279; KRS: 0000635116; REGON: 365350266, represented by the Management Board.

The purpose of the Privacy Policy is to collect the most important rules regarding the processing of personal data by the Conflict Foundation. In the interests of the security of the data entrusted to us, we have developed internal procedures and recommendations to prevent disclosure of data to unauthorised persons. We control their performance and constantly check their compliance with the relevant legal acts – the Personal Data Protection Act, the Act on Electronic Services, as well as all types of executive acts and acts of community law, such as the General Data Protection Regulation of 27 April 2016 (GDPR).

#### Whose data do we process and on what terms?

• Personal data of recipients of the Foundation's activities

We may collect and process the following personal data of our recipients: first name and last name, age, education, information about health, telephone number, address of residence, registered address, data of family members, professional, family and financial situation, judgments of judicial authorities, administrative decisions. The purpose of processing is: implementation of projects aimed at providing assistance and support; control purposes by authorised entities. We process the data on the basis of Article 6(1)(e) of the GDPR, i.e. the performance of a public task, and Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the administrator. We share your data with processing entities that we commissioned to perform some of the services and with bodies authorised by law.

We process sensitive personal data necessary to provide assistance and support pursuant to Article 9(2)(b) of the GDPR (processing is necessary to fulfil the obligations and exercise specific rights by the administrator or the data subject in the field of social security and social protection), Article 9(2)(c) of the GDPR (processing is necessary to protect the vital interests of the data subject) and Article 9(2)(d) of the GDPR (processing is carried out as part of the authorised activity conducted with appropriate safeguards by a foundation, association or other non-profit entity with political, ideological, religious or trade union goals).

We store your data for a period of min. 5 years after the end of the year in which the project ended, due to settlement and control obligations.

• Data of users of the kuchniakonfliktu.pl and onasznami.org websites

Through our website, we collect data only to the extent that is necessary to manage these websites, ensure the smooth operation of the functionalities offered within them and analyse the effectiveness of communication.

When using the Foundation's website, the so-called system logs are automatically saved. These are anonymous pieces of information such as the time of the user's visit to the website, the user's IP address, URL address, browser type, data on downloaded files, etc.

We store statistical data on the use of the websites until the end of the Foundation's operation based on our legitimate interest.

• Data of people supporting us with donations

Financial support for the Conflict Foundation is possible by transferring a donation to a bank account or through the PayU system which supports online payments in Polish banks and via payment cards.

In the case of a donation transferred to a bank account, we process personal data provided to us by the bank, i.e.: first name and last name, account number, donation amount, address. It is necessary to perform the contract and fulfil the legal obligations imposed on the Foundation (e.g. on the basis of accounting regulations).

In the case of a donation made via the PayU system, please provide your first name and last name, so that we know with whom we are concluding a contract (e.g. to be able to issue a certificate that will allow you to deduct the donation from tax or return money paid by mistake), the amount of the donation and your e-mail address which is necessary for the technical handling of payments. It is necessary to perform the contract and fulfil the legal obligations imposed on the Foundation. Providing data is voluntary, but necessary to make a donation.

We process the data of people supporting us with donations for 5 years from the end of the calendar year in which we recorded the last interaction with a given person (e.g. we received a donation, we recorded a resignation from the newsletter or participation in an event organised by us that requires registration).

• Data of persons using non-public communication channels

We process the data of persons with whom we contact via e-mail (kuchniakonfliktu@gmail.com and refugeefund.poland@gmail.com), by phone, via text messages or by letter, on the basis of a legitimate interest, in order to handle correspondence, for purposes arising from the content of communication or to establish contact in the future. This data may include first name and last name, address, e-mail address, telephone number and any other information contained in the content of the message. Providing this data is voluntary. We process data for archiving purposes, as well as for relationship management until the end of the Foundation's operations, with the exception of sensitive personal data, which we delete or anonymise immediately after closing a given case.

• Data of people communicating with the Foundation via social network sites and instant messengers

Facebook and Instagram are administrators of their users' personal data and process them on the basis of their own regulations. When you interact with us via Facebook or Instagram (liking/following the page, joining the group we manage, reactions to posts, shares, comments, private messages), apart from Facebook and Instagram, the administrator of your personal data becomes the Conflict Foundation as well. We process data such as first name and last name/nickname, image, public profile and other information provided in messages or comments until the end of the Foundation's operations based on our legitimate interest, in order to respond to comments and messages, maintain relationships with people interacting with us, as well as to analyse the effectiveness of communication.

• Data of participants of events organised by the Conflict Foundation

In the case of organising events that require registration, as a rule, we ask you to provide: first name and last name, e-mail address, telephone number, unless the nature of the event requires collecting other information. We process this data in order to organise the event, and the basis for processing is the performance of tasks in the public interest resulting from the Conflict Foundation's statute.

After the event is over, we process participants' data on the basis of our legitimate interest to manage relationships for 5 years from the end of the calendar year in which we recorded the last interaction with a given person. If you want us to remove them sooner, please write to us at: <u>kuchniakonfliktu@gmail.com</u>. In the case of events organised with the funds of funders requiring us to store documentation for a longer period, we will provide the relevant information when registering for the event.

• Work candidates' data

We process candidates' data on the basis of our right under the law, namely art. 22 of the Polish Labour Code, in order to carry out the recruitment procedure. We process this data until the end of the given recruitment process. In justified cases, we may ask you to enter in the recruitment materials (CV and/or covering letter) your consent to the processing of your data also in future recruitment processes, in order to send you work offers. The relevant information will then be included in the work advertisement. In such a situation, your data will be processed until you withdraw your consent, but not longer than 5 years from the end of the last recruitment process in which you took part.

# **Google Analytics**

On our website, we use Google Analytics, a web analytics service provided by Google Inc. For this purpose, we use, among others, cookies. Further information about Google Analytics is available in the <u>Google Analytics Terms</u> of <u>Service</u>, the <u>Google Analytics Privacy and Data Protection Guidelines</u> and the <u>Google Privacy Policy</u>.

# Complaints

If you want to exercise your rights regarding personal data, or simply ask a question related to our Privacy Policy, please contact us at: <u>kuchniakonfliktu@gmail.com</u>

You also have the right to submit complaints in matters related to the issues regulated by our Privacy Policy.

Complaints can be submitted in writing, by registered letter to the address of the Foundation.

A properly submitted complaint should contain at least the first name and last name, correspondence address, as well as the content and basis for making the complaint. Providing the above information is the basis for

considering the complaint. Complaints that do not meet the above requirement will not be considered.

Complaints will be considered within 14 days of their receipt by the Foundation.

## Data sharing

The Conflict Foundation will only share your personal data with:

- entities processing data on our behalf, at our request and for the same purpose on the basis of an authorisation or an agreement to entrust the processing of personal data (e.g. IT or accounting services for the Foundation).
- entities authorised under applicable law (e.g. law enforcement authorities).

In addition, in the case of communication by traditional mail, we entrust personal data to postal intermediaries (Poczta Polska [Polish Post] and other companies operating under the postal law) for processing on the basis of entrustment agreements and service regulations.

Personal data collected as part of projects financed from public funds may be made available for the purpose of monitoring, reporting and auditing the implemented project, only to entities authorised to carry out the above activities or their representatives.

Your data is not subject to automated decision making, including profiling.

# Your rights

In regards the processing of your personal data by us, you have the following rights:

If you wish to access, correct, update or request deletion of your personal data, you can always do so by contacting us at any time: <u>kuchniakonfliktu@gmail.com</u>.

In addition, you can object to the processing of your personal data, ask us to limit the processing of your personal data or request the transfer of your personal data. Similarly, you can exercise these rights by contacting us at <u>kuchniakonfliktu@gmail.com</u>.

Where we have collected and processed your personal data with your consent, you may withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing that took place prior to that withdrawal, nor will it affect the processing of your personal data based on lawful processing grounds other than consent. You also have the right to make a complaint with the supervisory body dealing with the protection of personal data if you believe that the processing of your personal data violates the provisions.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### Data security

When processing your personal data, we use organisational and technical measures in accordance with the applicable law. We store most of the data in electronic form: primarily on our own and rented servers, as well as – to a limited extent – on office computers, external drives and telephones. We process data via IT tools used by the team and entities cooperating with the Conflict Foundation, e-mail and cloud file storage. We store some of the data in the form of paper documentation, in properly secured cabinets and rooms.

## Cookies

Cookies are small text files that are sent to your device when you visit our websites: kuchniakonfliktu.pl and onasznami.org. Cookies contain, among others, the address of the website they come from, settings made by the website user regarding the page layout, text size, colours, contrasting version, data entered into forms and the value, which is usually an automatically generated unique number. The cookie mechanism does not collect any personal data or any confidential information from the end user's device.

By using the websites of the Conflict Foundation, you consent to the use of cookies. As an end user, you have the option of using the website without the use of cookies, but this means that some functions of the website will not work properly. Remember that you can independently and at any time change the settings regarding cookies, as well as delete cookies using the functions available in the web browser you use. If you do not agree to the use of cookies, you can select the option of rejecting cookies or signalling their sending in the browser settings.

## Changes to the Privacy Policy

The Conflict Foundation reserves the right to unilaterally amend this Privacy Policy at any time. The changes come into force on the day of their publication on the website <u>www.kuchniakonfliktu.pl</u>.