

APPROVED
with order of the director
of the limited liability company
«Agency for social projects «Yedynka»
№1/PD of May 25, 2018

**Code of conduct on personal data protection
of the limited liability company
«Agency for social projects «Yedynka»**

Kyiv, 2018

1. GENERAL PROVISIONS

1.1. Services that limited liability company «Agency for social projects «Yedynka» (hereinafter - the «Company») provides involve processing of personal data of employees, clients, including potential ones, and contractors. The Company regards it as a high goal and an obligation for itself to process personal data strictly on the grounds and in accordance with the procedure established by the Regulation (EU) 2016/679 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 repealing Directive 95/46/EC (General Data Protection Regulation), Ukrainian legislation, and in accordance with the Company's contractual obligations.

1.2. The purpose of this Code is to determine the Company's obligations and principles of efficient and secure protection of personal data in accordance with the best European and international practices and to ensure an adequate level of transparency with regard to the processing of personal data, protection of personal data to be processed and their usage when performing economic activities, as well as ensure proper informing of all stakeholders about the types of personal data to be processed by the Company, the general procedure and features of their processing.

1.3. The terms that this Code contains are used with the same meaning as in the General Data Protection Regulation.

1.4. The term of this Code validity is not limited. The Company has the right to amend the Code, about what shall immediately inform the public by disposing an updated code on the Company's website.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. Fairness and lawfulness.

The Company collects and processes any personal data according to the requirements established in the General Data Protection Regulation. When processing of personal data, the Company has an intention and takes all possible measures to ensure that the rights of data subjects to be protected. The Company collects and processes personal data faithfully, and solely for the purpose for which the data subject gave his or her consent.

2.2. Informing the data subjects about the purpose of personal data processing.

Whenever the Company collects personal data, it informs the data subjects about what kind of personal data the Company collects, for what purpose, whether the Company intends to transfer the data for third parties to process and about the data subject right to object of such transfer. The Company also provides its contact information, informs about its obligations regarding the protection of personal data, the right of data subject to update his or her data. The Company provides such information via its website.

2.3. Protection of human as a bearer of personal data.

The Company satisfies the data subjects' requests to provide information on what their personal data the Company owns and does it free of charge. The Company gives an opportunity for the data subject to correct his or her inaccurate data. The Company removes all data of the data subject, in case of his or her consent to collection and processing data withdrawal. The Company will inform the data subject if it becomes necessary for the Company to use personal data for purposes other than those for which consent was obtained. The Company stops processing the data for the period of resolving any dispute about the accuracy of the data or if the necessity of personal data storing has terminated but the data subject requires them to be saved for any litigation.

2.4. Data protection "by design" and "by default".

The Company takes technical and organizational measures to ensure that, by default, it processes a minimum of personal data, only those ones that are necessary to achieve the purpose of processing and within the minimum period that necessary to achieve the purpose. The Company shall also take measures to depersonalize of personal data, where necessary and possible, so that the data subjects cannot be identified.

2.5. Protection of personal data.

The Company controls the access to personal data in order to employees, contractors, agents can only inquire the personal data that they need to perform their duties. The Company requires such persons to keep strict confidentiality of personal data and to take technical and organizational measures to protect personal data. The Company guarantees that it will not transfer personal data to the contractors, agents and other third parties before signing data processing agreements with appropriate guarantees from their side to protect the personal data.

2.6. The personal data storing does not last longer than it is necessary.

The Company storages information containing personal data only if it is necessary for the purposes for which personal data was collected and within the period necessary to achieve such purposes. After the expiration of the period of personal data storing the Company destroys them without no possibility to reestablish.

2.7. Resolving any breach of data security in an urgent and appropriate manner.

The Company will take all necessary measures to reduce the impact of incidents with personal data, if any, on the data subject rights. If there will be any possibility that such incidents may cause a risk of data subjects rights and freedoms violation, the Company will notify the supervisory authority of such incident without delay, within 72 hours, since the Company became aware of such incident. Moreover, as soon as possible, the Company will report of such incident to the data subject so that he or she could take measures to reduce the risk of incident to impact on the rights and freedoms of the data subject.

3. GROUNDS FOR PERSONAL DATA PROCESSING

3.1. The grounds for the processing of personal data are:

- 3.1.1. consent of the data subject on processing of his or her personal data;
- 3.1.2. conclusion and execution of an agreement where the data subject is a party or which is concluded in the data subject`s favor;
- 3.1.3. necessity for the Company to fulfill its obligations under the law;
- 3.1.4. necessity for the Company to protect its legitimate interests, except cases when the necessity to protect the data subject`s fundamental rights and freedoms with regard to processing of his or her personal data dominates the mentioned interests.

3.2. The Company does not collect or process any personal data for future potential purposes.

4. THE DATA PROTECTION OFFICER

4.1. The Company has designated the data protection officer.

4.2. The tasks of the data protection officer are:

4.2.1. to inform and advise the management of the Company and the employees, who process the personal data, about their duties in accordance with the General Data Protection Regulation and other provisions of data protection legislation;

4.2.2. to develop a data protection culture in the Company by means of explanatory activities and/or training;

4.2.3. to recommend the adoption of corporate rules, procedures, data protection standards, to review them periodically and bring them into line with changes in data protection legislation.

4.2.4. to monitor compliance of the Company policy to the General Data Protection Regulation, including division of responsibilities, raise of awareness and training of personnel involved in personal data processing;

4.2.5. to provide recommendations to the Company about assessing the impact of data processing operations on the protection of personal data and to monitor the impact of such operations on data protection in accordance with Article 35 of the General Data Protection Regulation;

4.2.6. to cooperate with the supervisory authority;

4.2.7. to act as a coordinating body for the supervisory authority on matters relating to the processing, including the prior consultation referred to in Article 36 of the General Data Protection Regulation, and to advise on any other personal data matter if necessary;

4.2.8. to investigate incidents involving personal data and to recommend organizational and technical measures to reduce the possible impact on the data subjects rights and freedoms;

4.3. The Data Protection Officer keeps confidentiality when performing his or her tasks.

5. RESTRICTIONS ON THE TRANSFER OF PERSONAL DATA

5.1. Any transfer of personal data is possible only if the Company does not have resources and competence necessary to process the data independently in order to achieve the purpose for which data was collected. Such transfer is possible strictly on a contractual basis. The Company will act in such contractual relations as a controller and will carry the controller's duties according to the General Data Protection Regulation, and the party to which or whom the personal data will be transmitted as an operator.

5.2. In case of the necessity to conclude a contract as described in clause 5.1, the Company will select the operator based on operator's ability to meet all necessary technical and organizational requirements that guarantee the protection of personal data.

5.3. As mandatory terms of contract on personal data transfer are going to be operator's obligation to store and protect data properly and a clear stipulation of the operator's responsibility for ensuring adequate data protection with regard to processing them. The contract will also determine subject, purpose, duration of personal data processing, type of personal data to be processed and the categories of data subjects whose data are to be processed.

5.4. The Company may transfer data to operators located in third countries other than the member states of the European Union only if the operator can prove that it has a data protection standards equivalent to the General Data Protection Regulation. Equal to this condition may be:

a. Agreement on application standard in the European Union conditions regarding the data transfer for processing to third countries.

b. Operator's participation in the certification system accredited in the European Union regarding providing sufficient data protection level.

c. Operator's confirmation of accomplishment of its mandatory corporate rules which guarantee an adequate level of data protection.

6. DATA SUBJECTS' RIGHTS

6.1. Every data subject has the following rights:

6.1.1. The data subject may require information about what kind of his or her personal data the Company owns, as well as for what purpose the Company has collected them.

6.1.2. If the Company has transferred personal data, the data subject has the right to know the information about the recipient of his or her personal data.

6.1.3. If the personal data that the Company owns are incorrect or incomplete, the data subject may demand of correction or addition his or her data.

6.1.4. The data subject may object to processing of his or her personal data for the purposes of advertising or market research, or for any other purpose. The result of such objection is termination of his or her data processing by Company for the purpose against which he or she has objected.

6.1.5. The data subject may demand from the Company to remove his or her data if there are no legal grounds for processing them, or such grounds have terminated. Similarly, he or she may demand of data removal if the purpose for which they were collected is reached or lost its actuality.

6.1.6. Also the data subject has the right to object to storage of his or her personal data by the Company for any reason. The result of such object is the removal of his or her data, except when their storage is required by law.

6.2. The rights of the data subject listed in paragraph 6.1. are not comprehensive.

7. CONFIDENTIALITY OF PERSONAL DATA

7.1. The Company applies the confidentiality regulations to the personal data. Any unauthorized collection, processing or use of such data by the employees of the Company is prohibited. Any processing of data by an employee who was not authorized for this is unauthorized.

7.2. Employees of the Company may have access to personal data only for the performance of their duties and in a scope not exceeding the requirement for the performance of such a duty.

7.3. Employees are prohibited to use personal data for private or commercial purposes, to disclose it to unauthorized persons or to make it available in a different way.

7.4. The obligation to keep confidentiality of personal data is valid even after the termination of an employment.

8. SAFETY OF PERSONAL DATA PROCESSING

8.1. The Company protects personal data from unauthorized access and illegal processing or their disclosure, as well as accidental loss, modification or destruction of personal data. This condition is valid regardless of whether the data is to be processed in electronic or paper form. Before establishing new methods for data processing, especially new IT systems, the Company recognizes and implements technical and organizational measures for personal data protection.

8.2. The protection of personal data is part of the corporate information security policy of the Company. The Company periodically updates means of data protection in accordance with technical developments and organizational changes.

9. CONTROL OF PERSONAL DATA PROTECTION

9.1. The Company regularly performs self-monitoring of compliance its activity to this Code, the General Data Protection Regulation and other legislation on the personal data protection. Performance of this control is the responsibility of the data protection officer. The results of such control are reported to the top management of the Company.