



**NON-GOVERNMENTAL ORGANIZATION “CENTER FOR PSYCHOLOGICAL ASSISTANCE
“HAND OF SUPPORT”**

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PRIVACY AND PERSONAL DATA PROTECTION POLICY
NGO "Center for Psychological Assistance "Hand of Support"

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I. PURPOSE AND OBJECTIVES

1.1. This policy establishes the requirements and procedures for collecting, processing and protecting personal data of beneficiaries, as well as the preservation of information, information protection on the public resources of the NGO CPD "HAND OF SUPPORT".

1.2. The aim of the policy is:

1.2.1 to ensure compliance of the activities of the NGO CPD "HAND OF SUPPORT" with the legislation of Ukraine on the collection, processing and storage of personal data of beneficiaries and team members.

1.2.2. to provide mechanisms and procedures for the protection and confidentiality of collection, processing and storage of personal data and information about beneficiaries and members of the NGO team, as well as to increase the level of awareness and responsibility of the NGO team members in the field of information security.

1.3 The requirements of this regulation apply both to members of the NGO team and to representatives of the authorities or institutions that carry out the inspection of the activities of the NGO.

II. KEY CONCEPTS

2.1. **Personal Data** - any information relating to an identified natural person ("Beneficiary", "NGO Team Member").

2.2. **NGO team** - persons involved in the implementation of projects and programs, including employees, temporarily involved persons, executors under civil law contracts, etc.

2.3. **A beneficiary is** a person who directly receives goods or services within the framework of NGO programs. Persons defined by this term include vulnerable and affected populations, especially children, including refugees, internally displaced persons and other vulnerable persons, as well as members of the communities that host them.

2.4. **Processing of personal data** - any operation or set of operations carried out with personal data, including collection, recording, organization, storage, adaptation, modification, extraction, consultation, use, transfer, distribution, combination, blocking, deletion or destruction, etc.

2.3. **A personal data database** is an organized structure that contains the personal data of beneficiaries and ensures their systematization and access to them.

2.4. **The owner of the personal data database** is an NGO that owns and manages the database of personal data of beneficiaries and members of the NGO conanda defined in this provision.

2.5. **Personal data subject** - an individual to whom personal data belongs and who is identified or can be identified using such data.

2.6. **Consent of the subject of personal data** - any documented, in particular written, voluntary expression of will of an individual to grant permission to process his/her personal data in accordance with the formulated purpose of processing;

2.7. **Anonymization of personal data** is the removal of information that allows you to identify a person.

2.8. **Storage of information** - ensuring the proper state of information and its material carriers.

2.9. **Confidentiality of information** is a property of information, which consists in the fact that information cannot be obtained by an unauthorized user and (or) process. Information remains confidential if the established rules for familiarization with it are observed.

III. RESPONSIBLE PERSONS AND SCOPE

3.1 This policy applies to the entire team of the NGO, including persons with full-time, part-time employment or temporary workers, all contractors, customers, partner organizations cooperating with the NGO in the process of implementing projects or organizational activities, all who provide services under the contract and indirectly to beneficiaries and other parties who are participants in financial or other relations with the NGO, each of whom has the right to protection.

3.2. The head of the NGO makes a strategic decision on the collection, processing, storage and transfer of personal data, confidentiality and protection of information security.

3.3. The head of the NGO is responsible for ensuring the implementation of this policy on the safe and correct collection, storage, processing and transfer of personal data, privacy and information security, responding to requests, including the development and implementation of information security policies and procedures.

3.4. The head of the NGO can appoint team members responsible for the storage, processing and transfer of personal data, confidentiality and information security by issuing an appropriate order.

3.5. The head of the NGO is responsible for familiarizing team members with this policy, and will also take measures to raise the team's awareness of the knowledge of protection and security in the processing and storage of personal data, privacy and information security.

3.6. The Head of the NGO, program coordinators, project managers, etc., undertake to take effective measures to collect, process and store personal data, confidentiality and may not transfer personal data to other parties at their request without the written permission of the Head of the NGO.

3.7. The head of the NGO provides supervision and working control of the processing of personal data, confidentiality and information security.

IV. CONFIDENTIALITY, PRESERVATION AND PROTECTION OF INFORMATION

4.1. Access to cloud technologies such as Google Drive and others, where the principle of Least Privilege is used, where each user is given only those privileges and access levels that are necessary to perform his duties.

4.2. It is forbidden to use corporate mail for your own purposes.

4.3. From the moment they gain access to the work email of the NGO, Team members must comply with the confidentiality requirements of information distributed through this channel. They must not disclose confidential information to third parties without the proper permission of the Head of the NGO.

4.4. When publishing any information on public resources, it is necessary to take care to maintain the confidentiality of personal data and confidential information of NGOs. The Head of the NGO and the team are responsible for this. This applies to the NGO pages on social networks (Facebook, Telegram channels, etc.) and the corporate website.

4.5. Any information that has become known to the members of the NGO team in connection with the performance of obligations under the contract with the NGO, and the disclosure of which may cause harm to the other Party, is a trade secret and is not subject to disclosure to third parties or publication without the prior consent of the other party. For the disclosure of this information, the guilty party bears responsibility provided for by the current legislation of Ukraine.

4.6. Confidential information is considered to be, among other things, information that is of actual or potential commercial value to the NGO and is unknown to third parties, and in relation to which the NGO takes measures to protect its confidentiality, as well as other information that is not a trade secret, but in respect of which the NGO has declared that it is confidential.

4.7. Members of the team undertake not to disclose or disclose to third parties the confidential information provided to them by the NGO during the term of the contract with the NGO and after its termination, and not to use it for any purpose other than the one for which such information was provided by the NGO, without obtaining the prior written consent of the NGO. The NGO reserves the right, if necessary, to control the use of confidential information by team members and its storage.

4.8. Members of the team and NGOs undertake to maintain the confidentiality of negotiations, correspondence and other actions related to the contractual terms, and not to disclose such information to third parties without the written consent of the other party.

V. DATABASES OF PERSONAL DATA BY THE OWNER OF WHICH IS NGO

4.1. The processing of personal data of NGOs is carried out for the implementation of programs and projects of NGOs, protection of beneficiaries and team members of NGOs and other purposes determined by the legislation of Ukraine.

4.2. The grounds for the emergence of the right to use personal data are:

- consent of the subject of personal data to the processing of his/her personal data in writing or by electronic means (**Appendix 1**);
- permission to process personal data granted by the NGO in accordance with the legislation of Ukraine.

4.3. The NGO owns and processes the following databases of personal data:

4.3.1. A database of beneficiaries that contains basic information about beneficiaries, including name, surname, contact details, information about the support received, etc.

4.3.2. The purpose of processing the database of personal data of beneficiaries is to comply with the requirements of the law, to exercise the rights granted to the NGO by the legislation and to ensure the implementation of tax relations and relations in the areas of accounting, auditing, etc.

4.3.3. Database of personal data of NGO team members. The database of personal data of the NGO team members contains information about the Last Name, First Name, patronymic, date and place of birth, home and mobile phone, e-mail address, place of registration, passport data, registration number of the taxpayer's registration card, education, marital status, children,

citizenship, the presence of a passport, the presence and category of a driver's license, the presence of a criminal record, data on work experience, and other data as needed.

4.3.4. The purpose of processing the database of personal data of NGO team members is to maintain personnel records, prepare, in accordance with the requirements of the legislation and internal standards and policies of the NGO, statistical, administrative and other information on personnel issues, as well as internal documents of the NGO on the implementation of rights and obligations determined by the legislation and collective agreement in the field of labor relations and social protection, etc.

4.4. Possessing a database of personal data of beneficiaries and members of the NGO team, the NGO undertakes to use this data only for the specified purposes specified in the charter or other legal documents of the NGO and in accordance with the principles of legality, fairness and transparency.

4.5. The NGO will not transfer the personal data of beneficiaries and members of the NGO team to third parties without proper legal grounds, such as the consent of the beneficiaries or the legal requirements of the relevant authorities.

4.6. The NGO transfers personal data to third parties only by order of the Head of the NGO.

4.7. The basis for the transfer of personal data must be an agreement or other mechanisms recorded in writing that guarantee an adequate level of protection of this data and ensure compliance with the requirements of the legislation on the protection of personal data of Ukraine.

VI. LIMITED ACCESS TO PERSONAL DATA

5.1. The NGO provides limited access to the personal data of beneficiaries and members of the NGO team only to employees and other persons who have the necessary written authorized access to such data from the Head of the NGO.

5.2. Access to personal data is provided only to the extent necessary to fulfill certain tasks and responsibilities in the implementation of projects and programs of NGOs.

5.3. The staff of the NGO who has access to the personal data of beneficiaries and members of the NGO team undertakes to maintain confidentiality and take all necessary security measures to protect this data in accordance with this Policy, Ukrainian legislation.

5.4. Rights of personal data subjects:

5.4.1. Personal data subjects have the right to protection of their personal data and their use in accordance with the law and this provision.

5.4.2. Personal data subjects have the following rights:

a) Right to information: Data subjects have the right to be informed that their personal data is being collected and processed, the purposes of the processing, the categories of data recipients and the legal basis for processing in accordance with **Annex 1**.

b) Right of access: Personal data subjects have the right to access their personal data stored in the NGO personal data database and to receive copies of this data by submitting a written request to the NGO Head.

c) Right to rectification: Data subjects have the right to request the rectification of false or inaccurate personal data concerning them.

d) Right to removal: Personal data subjects have the right to request the deletion of their personal data from the NGO personal data database in the event that this data is no longer needed for the specified purposes or if their processing is illegal.

e) Right to restriction of processing: Data subjects have the right to restrict the processing of their personal data in certain situations, in particular if the processing is unlawful or the data subject objects to the processing.

f) Right to data portability: Personal data subjects have the right to receive their personal data that they have provided to the NGO in a structured, commonly used and machine-readable format, as well as to transmit this data that they have provided to the NGO in a structured, commonly used and machine-readable format, as well as to transmit this data to another personal data owner without interference from the NGO, if the processing is based on consent or a concluded contract and is carried out in an automated manner way.

g) Right to withdraw consent: In the event that the processing of personal data is carried out on the basis of the consent of the data subject, the subject has the right to withdraw his consent at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

h) Right to lodge a complaint: Data subjects have the right to lodge complaints with the relevant supervisory authorities if they believe that their rights in the field of personal data protection have been violated.

i) Other rights: Personal data subjects also have other rights provided for by personal data protection legislation.

5.6. The application of the rights of personal data subjects is carried out by applying to the NGO of the Law of Ukraine "On Personal Data Protection". The NGO is obliged to ensure the possibility of exercising these rights and respond accordingly to the requests of personal data subjects within the requirements of the law.

VII. PROCEDURE FOR PROCESSING PERSONAL DATA

6.1. The processing of personal data is carried out in accordance with the requirements of the law, the principles of confidentiality and security of personal data.

6.2. Personal data is collected and processed in accordance with the permission of the established form (**Annex 1**).

6.3. The NGO ensures the implementation of appropriate measures to protect personal data from unauthorized access, accidental loss or damage, destruction, alteration, distribution or illegal processing by constantly updating the security of automated means of storing personal data and a safe and secure place in the office, archive of the NGO for non-automated means of storing personal data.

6.4. The processing of personal data can be carried out by the NGO or on its behalf by third parties on the basis of concluded agreements or on the basis of legal grounds determined by law.

6.5. The NGO ensures the storage of personal data (automated and non-automated) for the period necessary to achieve the purposes of processing in accordance with the terms of the project implementation agreement, unless otherwise provided by law or an agreement with the personal data subject.

6.6. Termination of the processing of personal data can be carried out at the initiative of the subject of personal data, at the written request of regulatory authorities or in case of fulfillment of legal requirements determined by law.

6.7. The transfer of personal data to third parties can be carried out only in cases provided for by law, the project implementation agreement and in accordance with the requirements for ensuring the confidentiality and security of personal data.

6.8. In case of a breach of the security of personal data, which may lead to unauthorized access, loss, alteration or damage of such data, the NGO is obliged to notify the relevant supervisory authority and personal data subjects in accordance with the requirements of the law.

6.9. The NGO provides appropriate conditions for exercising the rights of personal data subjects, in particular the rights to access personal data, correct false or inaccurate data, extract data, etc.

CONSENT to the processing of personal data (can be integrated into other documents of the NGO, where the beneficiary puts his/her signature and is informed about the data collection)

By signing this document, I _____ give my consent to:

- collection, registration, storage, use and other forms of processing of my personal data, including the use of information systems,
- monitoring, as well as for photo fixation of any necessary personal documents provided by me in paper form or in photocopy format.

Consent is provided in full, without additional written notice for the execution, provision and monitoring of the quality of the assistance received and other purposes related to the assistance received.

I also consent to the transfer and processing of all personal data by third parties without exception for the purpose of verification and assessment of the quality of the assistance received.

With my signature, I confirm that I have been notified of my rights as a subject of personal data, which are defined in Art. 8 of the Law of Ukraine "On Personal Data Protection", as well as the purpose of collecting this data and the persons to whom this data is transferred.

Date:___ Signature:_____