

Privacy Policy

1. General provisions.

1.1. This Privacy Policy (hereinafter – PP) is based on and fully corresponds with the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). This PP determines the procedure for processing personal data and measures to ensure the security of personal data taken by the charity foundation "Code of Brave" (hereinafter – Operator).

1.2. The operator sets as its most important goal and condition for the implementation of its activities the observance of the rights and freedoms of a person and a citizen in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets.

1.3. This PP applies to all information that the Operator may obtain about visitors to the <https://codeofbrave.org> website.

2. Definitions.

2.1. Automated processing of personal data - processing of personal data using computer technology.

2.2. Blocking of personal data is a temporary suspension of the processing of personal data (unless the processing is necessary to clarify personal data).

2.3. Website - a set of graphic and informational materials, as well as programs and databases that ensure their availability on the Internet at the network address <https://codeofbrave.org>.

2.4. Personal data information system - a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data - actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data by a specific subject of personal data.

2.6. Cookies - data that is automatically transmitted to the Operator in the process of using the website using the software installed on the User's device, including IP address, geographic location, information about the browser and type of operating system of the User's device, technical characteristics of equipment and software used by the User, date and time of access to the website.

2.7. Processing of personal data - any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.8. Operator - a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, the actions (operations) performed with personal data.

2.9. Personal data - any information relating directly or indirectly to a specific or identifiable Website User.

2.10. User – any visitor to the website.

2.11. Providing personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data - any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or familiarizing with personal data of an unlimited number of persons, including the disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data - any actions as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.

3. List of personal data.

3.1. The Operator may process the following personal data of the User:

3.1.1. Last name, first name, middle name or patronymic.

3.1.2. Phone number.

3.1.3. E-mail address.

3.1.4. Impersonal data about the visitor (including cookies) using Internet statistics services (Google Analytics and others).

3.2. The above data, further in the text of the PP, are united by the general concept of Personal data.

4. Purposes of personal data processing.

4.1. The purpose of processing the User's personal data:

(i) identification of the User;

(ii) providing personalized advertising and marketing materials;

(iii) maintaining communication with the User;

(iv) conclusion, execution and termination of civil law contracts;

(v) improving the service to Users;

(vi) respond effectively to User requests;

(vii) statistical and other studies based on depersonalized personal data provided by the User;

(viii) granting access to the User to the services, information and/or materials contained on the website;

(ix) technical support of the website, identification of problems in its operation and their elimination;

(x) for other purposes, subject to obtaining the separate consent of the User.

4.2. Also, the Operator has the right from time to time to send the User information materials and notifications about new products and services, special offers, events and other events.

4.3. The User can always refuse to receive information materials and notifications by sending a message to the Operator at the email address info@codeofbrave.org marked "Refusal of notifications about new products and services and special offers".

4.4. Non-personal data of Users collected using Internet statistics services are used to collect information about the actions of Users on the site, improve the quality of the website and its content.

5. Legal grounds for the processing of personal data.

5.1. The Operator processes the User's personal data only if they are filled in and / or sent by the User independently through special forms located on the website <https://codeofbrave.org>. By filling out the relevant forms and / or sending their personal data to the Operator, the User expresses his consent to this PP.

5.2. The Operator does not check the personal data provided by the User. In this regard, the Operator proceeds from the fact that when providing personal data on the website, the User:

5.2.1. Is a competent person. In case of incapacity of the person using the website, consent to the processing of personal data is provided by the legal representative of the User, who has read and accepted the conditions for processing personal data specified in this PP.

5.2.2. Indicates reliable information about himself or about the represented incapacitated person (clause 5.2.1 of the PP) to the extent necessary to use the website. The user independently maintains the provided personal data up to date. If the User provides false or insufficient information, the Operator is not responsible for the proper performance of its obligations to the User.

5.3. The Operator processes anonymized data about the User if it is allowed in the User's browser settings (saving cookies and using JavaScript technology is enabled).

6. The procedure for collecting, storing, transferring and other types of processing of personal data.

6.1. The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

6.2. Personal data is processed using automated systems, except when non-automated processing of personal data is necessary in connection with the fulfillment of legal requirements.

6.3. The operator ensures the safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons, including:

6.3.1. Appointment of a person responsible for the processing of personal data.

6.3.2. Application of organizational and technical measures to ensure the security of personal data during their processing in information systems.

6.3.3. Monitoring cases of unauthorized access to personal data and taking measures to prevent such incidents in the future.

6.3.4. Control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

6.4. In case of detection of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator to the Operator's e-mail address info@codeofbrave.org marked "Updating personal data".

6.5. The term for processing personal data is unlimited. The User may at any time withdraw his consent to the processing of personal data by sending a notification to the Operator by e-mail to the Operator's email address info@codeofbrave.org marked "Withdrawal of consent to the processing of personal data".

6.6. The storage of the User's personal data is carried out on electronic media. When processing personal data in order to fulfill obligations under agreements with the User, the Operator may extract personal data and store them on tangible media.

6.7. The distribution of personal data can be carried out by the Operator in cases where such distribution is necessary by virtue of the current legislation, as well as for the purpose of posting reviews about the services provided by the Operator, left by Users, in various sources of information.

6.8. The operator has the right to transfer personal data to third parties subject to the following conditions:

- A third party processes personal data using databases in the territory of the European Union.
- The third party ensures the confidentiality of personal data during their processing and use.
- The third party undertakes not to disclose to other persons, and also not to distribute the personal data of the Users without the written consent of the Operator.
- The third party guarantees compliance with measures to ensure the security of personal data during their processing, including: the use of information security tools; detection and recording of facts of unauthorized access to personal data and taking measures to restore personal data; restriction of access to personal data; registration and accounting of actions with personal data; control and evaluation of the effectiveness of the measures taken to ensure the security of personal data.

7. Cross-border transfer of personal data.

7.1. Before the start of the cross-border transfer of personal data, the operator is obliged to make sure that the foreign state to whose territory the transfer of personal data is supposed to be carried out provides reliable protection of the rights of subjects of personal data.

7.2. Cross-border transfer of personal data on the territory of foreign states that do not meet the above requirements can be carried out only if there is a written consent of the subject of personal

data to the cross-border transfer of his personal data and / or execution of an agreement to which the subject of personal data is a party.

8. Final provisions.

8.1. The User can receive any clarifications on issues of interest regarding the processing of his personal data by contacting the Operator via e-mail info@codeofbrave.org.

8.2. This PP may be changed by the Operator unilaterally at any time. The Operator is not liable to the User for changing the terms of the PP without the notification and / or consent of the User. The User undertakes to regularly check the provisions of the PP for possible changes and / or additions.

8.3. The current version of the PP in the public domain is located on the Internet at the address https://codeofbrave.org/privacy_policy.