

PRIVACY POLICY

August 31, 2021

1. GENERAL PROVISIONS

1.1. Purpose of Policy

This document (hereinafter referred to as Policy) was adopted by Big Change Charitable Foundation (hereinafter referred to as Fund) in order to comply with the requirements of the Russian Federation's legislation to ensure protection of personal data subjects' rights processed by Operator in course of economic activities, to respect their privacy and safety of data processing. This Policy applies to all information that Charitable Foundation "Big Change", located at: 109044, Moscow, Sarinsky proezd, 13, building 1, can receive about Personal data subject and can provide Personal data subject with while using website or social networks of Operator located at the addresses: www.bigchange.ru; <https://www.facebook.com/BigChangeFoundation>; <https://vk.com/bperemena.fond>; https://www.instagram.com/bigchange_fund/; <https://zen.yandex.ru/id/6103fc4f47b9f36cada3dcdf>, and while communicating with Fund in any form, in accordance with legislation of Russian Federation and this Policy. The Policy is a publicly available document stating the basis of Operator's activities in personal data processing to any interested party.

1.2. Main definitions

- **Operator of personal data (Operator)** - Charitable Foundation "Big Change" together with the site administration processes personal data and also determines the purposes of processing personal data, the types of personal data to be processed, actions (operations) performed with personal data;
- **Site administration** - employees authorized to manage the site and social networks, acting on behalf of the Charitable Foundation "Big Change", who organize and (or) process personal data;
- **Personal data subject** – a natural person who voluntarily provides his personal data to the Operator in course of interacting with it;
- **User of the site and social networks** – natural person, data subject who has access to the site and/or social networks via the Internet and uses them;
- **Personal data** - any information relating directly or indirectly to a specific or identifiable natural person (Personal data Subject, Site User);
- **Processing of personal data** - any action (operation) or a set of actions (operations) with personal data performed with or without use of automation tools. The processing of personal data includes, but is not limited to:

collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction;

- **"Cookies"** - a small piece of data sent by the web-server and stored on the User-end computer, that the web-client or web browser sends to web-server each time in an HTTP request when trying to open the page of the corresponding site;

- **"IP-address"** - a unique network address of a node in a computer network built using the IP protocol.

1.3 Main rights and duties of Operator and Personal data subject(s)

1.3.1. Rights and duties of the Operator

The Operator is obliged to take organizational and technical measures sufficient to ensure the required level of security of the personal data provided by the Data Subject, in accordance with Article 19 of the Federal Law of July 27, 2006 No. 152 "On Personal Data".

Upon request of the Personal data subject the Operator is obliged, in the manner and on the conditions established by federal laws, to provide Personal data subject with clarifying information regarding his/her personal data.

1.3.2. Rights and duties of Personal data subject

Personal data subject has the right to accept or not accept the provisions of Policy. Use of the Operator's website and social networks by Personal data subject means his/her acceptance of Policy and Terms of processing the personal data.

In accordance with the procedure and on the terms of the Federal Law of 27.07.2006, No. 152 "On personal data", Personal data subject has the right to demand that Operator should clarify his /her personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights.

In case of disagreement with Terms of Policy, User is obliged to stop using the websites and social networks of Operator.

Data subject has the right to revoke his consent to the processing of personal data in accordance with Article 9 of the Federal Law of the Russian Federation of July 27, 2006 No. 152-FZ "On Personal Data" in cases where Operator processes personal data based on the consent of the Data Subject.

2. PERSONAL DATA PROCESSING

2.1. Purposes of personal data processing

Operator processes personal data for the following purposes:

- implementation of statutory activities of Operator, prescribed in the constituent documents of Operator;
- providing to Personal data subject with information about Fund, its activities, services and events;
- registration of Personal data subject as a participant in events held by Fund (at the initiative of Subject of personal data);
- provision of informational, advisory and other assistance (support);
- accepting donations from Personal data subjects and filling out questionnaires for other types of assistance using the Foundation's website or in another way;
- interaction with Personal data subjects in the process of rendering assistance to the Fund;
- providing feedback with Users of Operator's website and social networks, including for obtaining opinions from users, questions about the information of the website and information products of Operator, as well as for sending them answers;
- fulfillment of the Fund's obligations in accordance with the legislation of the Russian Federation.

2.2. Legal basis for processing of personal data

The legal basis for processing of personal data is a set of legal acts, in order to pursue which Operator processes personal data:

- the Constitution of Russian Federation;
- the Tax Code of Russian Federation;
- Civil Code of Russian Federation;

- Code of Russian Federation on Administrative Offenses;
- Labor Code of Russian Federation;
- Federal Law "On Education in the Russian Federation" dated December 29, 2012 N 273-FZ;
- Internal local acts of the Operator;

2.3. The scope and categories of processed personal data, categories of personal data subjects

2.3.1. Scope and categories of processed personal data

The scope of data processed by the Operator and categories of subjects of Personal data that should be processed by the Operator are determined in accordance with the purposes (clause 2.1. of Policy) for the processing of personal data.

Operator does not process personal data that is excessive in relation to the specified processing purposes.

Categories of personal data processed by Operator:

2.3.1.1. Technical data

Technical data automatically transmitted by devices used by Personal data subjects to fill in the appropriate forms (fields) on the Foundation's website, which are automatically transmitted when of information videos and while visiting pages on which the statistical system script ("pixel") is installed:

- IP address;
- information from cookies;
- information about the browser (or other program that provides access to the video);
- access time;
- the address of the page on which the information video is located;
- referrer (address of the previous page), User path.

Disabling cookies may result in the inability to access certain functions of the Foundation's website.

2.3.1.2. Personal data provided by Personal data subject

Upon filling out forms on the Operator's website Personal data provided by Personal data subject; upon filling out the corresponding forms (fields) on the Fund's website, including filling out contact forms, questionnaires; upon subscribing to a newsletter (information); upon transferring donations to the Fund; upon registering for events or registration for volunteer and other meetings of the Foundation:

- full name;

- email address;

- contact phone number,

- date of birth;

- the field of activity and other data that its subject considers necessary to communicate in order to achieve the goals specified in this Policy.

2.3.1.3. Personal data provided by Personal data subject

upon other interactions with the Operator Personal data indicated on the initiative of Personal data subject in electronic and other messages, questionnaires, applications, phone calls sent to Fund.

2.3.2. Under this Policy Operator processes personal data

of the following categories of Personal data subjects:

- individuals who are Users of Operator's website;

- individuals who are Users of Operator's social networks;

- individuals making charitable donations using Operator's website and by other means;

- individuals and legal entities who are featured in news stories, mailings or other materials of Operator;

- individuals who are founders, members of management bodies, employees of Operator;

- individuals who made an incoming call to the "First Call" call center or persons who sent a letter to Operator's email address;
- individuals who have registered at Operator's website as volunteers or who have expressed a desire to become a volunteer in other ways;
- the subject of personal data who initiated interaction with Operator in other ways;
- individuals accepting assistance from the Fund.

2.3.3. Sources of obtaining personal data processed by Operator

The source of personal data is:

- site users willing to take part in the activities of Fund on a voluntary basis as a benefactor or volunteer, who provided information about their personal data to Operator by filling out a questionnaire on the site or in other ways;
- persons who are in a contractual relationship with Operator;
- persons in need of charitable assistance by contacting First Call information center using the contact details indicated on the website;
- philanthropists providing assistance to Operator on a contractual basis;
- persons who have expressed a desire to take part in the Fund's activities in other ways.

The Operator may process personal data of natural persons who are Users of Operator's website only in the amount of data provided by Personal data subject in feedback form containing the confirmation condition for Personal data subject to that processing.

Circulation of personal data is carried out strictly after signing by Personal data subject an appropriate consent for circulation of his/her personal data.

2.4. Principles, procedure and conditions of personal data processing

2.4.1. Principles of personal data processing

In the course of activities the Operator guarantees compliance with the principles of personal data processing specified in Art. 5 of the Federal Law of the Russian Federation of July 27, 2006 No. 152-FZ "On Personal Data", including:

- the processing of personal data is carried out on a legal and fair basis, complies with the stated purposes and methods of processing personal data;
- the processing of personal data is limited to the achievement of specific, predetermined goals. Processing of personal data outside of the stated purposes of collecting personal data is not allowed;
- the operator does not allow the unification of databases containing personal data, the processing of which is carried out for purposes incompatible with each other. The operator monitors the compliance of the volume and nature of the processed personal data;
- under processing personal data, the accuracy of personal data, its sufficiency for the purposes of personal data processing is ensured. The operator takes measures to remove or clarify incomplete or inaccurate data, makes regular diagnostics of the relevance of personal data provided by Personal data subject;
- the storage of personal data should be carried out in a form that allows Personal data subject to be determined no longer than the purpose of its processing requires this, if the storage period for personal data is not established by federal law or contract.

2.4.2. Procedure and conditions of personal data processing

The conditions of personal data processing are determined by the Federal Law "On Personal Data" dated July 27, 2006 N 152-FZ, this Policy, local acts of Operator that regulate the relevant areas of the statutory activities of Operator.

With regard to personal data, Operator carries out actions (operations) or a set of actions (operations) performed both with the use of automation tools and without the use of such means, including collection, recording, systematization, accumulation, storage, clarification (update, alteration), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

When storing personal data, Operator uses databases located on the territory of the Russian Federation.

The operator uses a mixed (with and without automation tools) method of processing personal data.

The operator discloses the processed personal data only in cases provided by legislation of the Russian Federation.

The processing of personal data continues until the fulfillment of the goals specified in clause 2.1. of this Policy.

2.5. Updating, correcting, deleting and destroying personal data, responses to requests of Personal data subjects regarding access to personal data

In case of factual confirmation of inaccuracy of personal data or the illegality of their processing, the personal data are subject to actualization by the Operator, and the processing must be suspended, respectively. The Operator is obliged to inform the Personal data subject or his/her representative about the processing of personal data carried out by the Operator. Such information is provided upon request.

Requests and (or) appeals of Personal data subjects and their representatives, authorized bodies regarding the inaccuracy of personal data, the illegality of their processing, revocation of consent and access of Personal data subjects to their data are processed by the Operator within 30 calendar days, unless a shorter period is established by law of RF.

Requests can be sent / delivered personally, by mail, e-mail, and also via courier organizations. The form of the request and (or) appeal is arbitrary. The request must enable the identification of its originator, and it may also contain contact details for sending a response.

Upon reaching the goals of personal data processing, as well as in case that Personal data subject withdraws consent to its processing, personal data are subject to destruction, unless otherwise provided by the agreement to which Personal data subject is a party, or if there are no other grounds for processing personal data established by law of RF.

The operator stops processing personal data in the following cases:

- achieving the goal of personal data processing;
- identification of illegal processing of personal data carried out by Operator;
- revocation of the consent for his/her personal data processing by Personal data subject, if, in accordance with the provisions of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", the processing of this personal data is allowed only with the consent of Personal data subject.

The destruction of personal data by Operator is carried out in the manner and terms stated by the Federal Law of the Russian Federation of July 27, 2006 No. 152-FZ "On Personal Data".

The processing of personal data of individuals who are Users of Operator's website and social networks is carried out by the Operator in the amount of data provided by Personal data subject himself in a form containing the condition for Personal data subject to confirm his consent to such processing.

2.6. Operator's information

The Big Change Charitable Foundation for the Education of Orphans;

INN 7725203709; OGRN 1027725001732; registered on 12.08.2002 at the legal address 109044, Moscow, Sarinsky proezd, house 13, building 1, e/ premise / room / 1-5

2.7. Additional terms

The site administration has the right to make changes to this Policy without the consent of User. New version of Policy takes effect from the moment it is posted on Foundation's website, unless otherwise provided by the new version of Policy.

All suggestions or questions about this Policy should be reported by e-mail:

info@bigchange.ru.

The current Policy regarding the processing and protection of personal data is posted on Foundation's website.