



The translation into English has been carried out from the Ukrainian language in accordance with the original document approved by the Association

APPROVED

By the decision of the Board 25/1
dated December 20, 2020

NEW EDITION

APPROVED

By the decision of the Board
Protocol No. 28/11
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**PERSONAL DATA PROCESSING POLICY
of the Local Association of Local Self-Government Bodies
“Association for Communities Participatory Development”**

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter referred to as the “Policy”) of the local association of local self-government bodies “Association for Communities Participatory Development” (hereinafter referred to as the “Association”) defines the general requirements for the processing and protection of personal data of data subjects that are processed, in whole or in part, using automated means of the Association, as well as personal data contained in the Association’s file system or intended for inclusion in the Association’s file system using non-automated means.

This Policy establishes the purpose of personal data processing before their collection begins. The processing procedures, processing duration, and the scope of personal data must be proportional to the purpose of processing.

Information on the responsible person of the Association who organizes work related to personal data protection.

1.2. The terms used in this Policy have the following meanings:

- Personal Data Database – a named collection of structured personal data in electronic form and/or in the form of personal data file systems;
- Personal Data Controller – a legal entity that determines the purpose of personal data processing, establishes the scope of such data, and processing procedures unless otherwise specified by law;
- Consent of the Personal Data Subject – voluntary expression of will by an individual (provided they are informed) to grant permission for the processing of their personal data in accordance with the formulated purpose of processing, expressed in written form or in a form that allows concluding that consent has been given;
- Anonymization of Personal Data – removal of information that allows direct or indirect identification of a person;

- File System – any structured personal data accessible by specific criteria, regardless of whether such data is centralized, decentralized, or distributed by functional or geographical principles;
- Processing of Personal Data – any action or set of actions such as collection, registration, accumulation, storage, adaptation, modification, updating, use, and dissemination (distribution, sale, transfer), anonymization, destruction of personal data, including the use of information (automated) systems;
- Recipient – a natural or legal person to whom personal data is provided, including a third party;
- Personal Data – information or a collection of information about an identified or identifiable natural person;
- Personal Data Processor – a legal entity that has been granted the right to process these data by the personal data controller or by law on behalf of the controller;
- Personal Data Subject – a natural person whose personal data is processed;
- Third Party – any person, except for the personal data subject, personal data controller, or processor, as well as the Commissioner of the Verkhovna Rada of Ukraine for Human Rights, to whom personal data are transferred by the controller or processor.

1.3. The Association is the controller and processor of personal data databases.

1.4. The purpose of personal data processing by the Association is to ensure the protection and implementation of constitutional, civil-law, labor relations, administrative-legal relations, and other relationships that require personal data processing, tax relations, and accounting relationships, human resource management, including personnel potential in accordance with the Labor Code of Ukraine, the Tax Code of Ukraine, the Law of Ukraine “On Accounting and Financial Reporting in Ukraine,” the Law of Ukraine “On Employment of the Population,” and the implementation of the statutory activities of the Association.

1.5. The composition of personal data processed by the Association includes:

- Surname, first name, patronymic;
- Passport data;
- Taxpayer identification number;
- Personal information (age, gender, etc.);
- Autobiography, résumé;
- Registered place of residence;
- Marital status, family composition, relatives, etc.;
- Educational background;
- Profession, specialty, qualification;
- Data confirming the employee's right to social benefits established by Ukrainian legislation;
- Electronic identification data (IP address, phone numbers, email addresses, etc.);
- Military registration information;
- Image recordings (photos, videos, audio recordings);
- Status as an internally displaced person (IDP), person with disabilities;
- Information regarding disciplinary investigations involving the individual;
- Information on cases of violence committed against the individual.

1.7. The accumulation of personal data is carried out in accordance with the Law of Ukraine “On Personal Data Protection” in certified databases. The database is legally registered and entered into the register of databases of Ukraine, making it legally certified. The Association bears full responsibility for the use of data from this database.

1.8. The retention period of personal data shall not exceed the time necessary for their lawful purpose and processing unless otherwise provided by the legislation on archiving and record management.

1.9. Personal data shall be stored under the following conditions:

- Legality: personal data must be processed only on lawful grounds;
- Compatibility: personal data must be obtained for specific lawful purposes and processed accordingly;
- Adequacy and non-excessiveness: personal data must be adequate, non-excessive, and correspond to the purposes of processing;
- Accuracy: personal data must be accurate and up-to-date;
- Storage duration: personal data must not be stored longer than stipulated by the data subject's consent or legal requirements of Ukraine;
- Respect for the rights of individuals: personal data must be processed with respect for the rights of the data subject, including the right to access data;
- Security: personal data must be processed in compliance with data protection requirements.

1.10. The responsibilities of the person responsible for organizing work related to the processing and protection of personal data within the Association include:

- Ensuring compliance with Ukrainian legislation on personal data protection;
- Protecting personal data in personal data databases from unlawful processing and unauthorized access;
- Developing, implementing, and ensuring the proper functioning of the personal data management system;
- Registering incidents in the personal data management system.

1.11. Personal data processing by the Association is carried out only with the consent of the personal data subject, except in cases where such consent is not required by law. The data subject's consent for the processing of their personal data must be voluntary and informed. Consent may be given in written (Appendix 1) or electronic form, which allows concluding that consent has been provided. Documents (information) confirming the subject's consent for personal data processing are stored by the Association during the entire period of data processing.

1.12. Except as provided by Ukrainian law, the Association informs the data subject about the composition and content of collected personal data, their rights as defined by law, the purpose of data collection, and third parties to whom their personal data are transferred:

- At the time of data collection if personal data are collected directly from the subject;
- In other cases, within thirty working days from the date of data collection.

The Association retains information (documents) confirming the provision of the above information to the data subject throughout the data processing period.

1.13. Personal data is processed in a form that allows the identification of the natural person to whom it relates for no longer than necessary in accordance with the purpose of its processing. In any case, it is processed in a form that allows the identification of the natural person to whom it relates for no longer than is provided for by legislation in the field of archival affairs and records management.

1.14. If information about a person is found to be inaccurate, such information must be immediately changed or deleted.

1.15. The data subject has the right to submit a reasoned request to the Association regarding the prohibition of processing their personal data (or part thereof) and/or changing its composition/content. Such a request is reviewed by the Association within 10 days from the date of receipt.

1.16. If, based on the review of such a request, it is determined that the personal data of the subject (or part thereof) is being processed unlawfully, the Association ceases the processing of the personal data of the subject (or part thereof) and informs the data subject. If, based on the review of such a request, it is determined that the personal data of the subject (or part thereof) is inaccurate, the data controller ceases the processing of the personal data of the subject (or part thereof) and/or changes its composition/content and informs the data subject.

1.17. If the request is not subject to satisfaction, the subject is provided with a reasoned response regarding the absence of grounds for its satisfaction.

1.18. The data subject has the right to withdraw consent to the processing of personal data without stating reasons, provided that consent is the sole basis for processing. From the moment consent is withdrawn, the data controller is obliged to stop processing personal data.

1.19. Deletion and destruction of personal data are carried out in a manner that excludes the possibility of restoring such personal data.

1.20. The procedure for access to the personal data of the data subject and third parties is determined by Articles 16-17 of the Law, namely:

- The procedure for access to personal data by third parties is determined by the conditions of the consent given by the data subject to the Association for the processing of such data or in accordance with the requirements of the law.

- Access to personal data is not granted to a third party if the specified party refuses to assume obligations to ensure compliance with the requirements of the Law "On Personal Data Protection" or is unable to ensure them.

- A subject of relations related to personal data submits a request to the Association for access to personal data (hereinafter – the request).

The request must specify:

- Surname, first name, and patronymic, place of residence (location), and details of the document identifying the natural person submitting the request (for a natural person - applicant);

- Name, location of the legal entity submitting the request, position, surname, first name, and patronymic of the person certifying the request; confirmation that the content of the request corresponds to the authority of the legal entity (for a legal entity - applicant);

- Surname, first name, and patronymic, as well as other information allowing the identification of the natural person regarding whom the request is made;

- Information about the personal data database for which the request is made or information about the owner or manager of the personal data;

- The list of personal data requested;

- The purpose and/or legal grounds for the request.

The period for reviewing the request for its satisfaction shall not exceed ten business days from the date of receipt.

Within this period, the Association informs the person submitting the request whether the request will be satisfied or whether the requested personal data is not subject to disclosure, indicating the legal basis specified in the relevant legal act.

The request is satisfied within thirty calendar days from the date of receipt unless otherwise provided by law.

The data subject has the right to obtain any information about themselves from any entity in relations involving personal data, provided that they provide information about themselves, namely: surname, first name, and patronymic, place of residence (location), and details of the document identifying the natural person submitting the request (for a natural person - applicant).

1.21. The Association informs the data subject about actions taken with their personal data under the conditions defined by Article 21 of the Law, namely:

- About the transfer of personal data to a third party;
- About the modification, deletion, or destruction of personal data or restriction of access to them within ten business days.

2. Protection of Personal Data

2.1. The Association takes measures to ensure the protection of personal data at all stages of its processing, including through organizational and technical measures.

2.2. The protection of personal data includes measures aimed at preventing its accidental loss or destruction, unlawful processing, including unlawful destruction or access to personal data.

2.3. Organizational measures include:

- determining the procedure for access to personal data of the Association's employees;
- determining the procedure for recording operations related to the processing of a subject's personal data and access to them;
- developing an action plan in case of unauthorized access to personal data, damage to technical equipment, or emergencies;
- regular training of employees working with personal data.

2.4. The Association keeps records of employees who have access to the subjects' personal data. The Association determines the level of access granted to these employees. Each of these employees has access only to those personal data (or parts thereof) necessary for the performance of their professional, official, or work-related duties.

2.5. All other employees of the Association have the right to full information only regarding their own personal data.

2.6. Employees who have access to personal data provide a written commitment not to disclose personal data that has been entrusted to them or that has become known to them in connection with the performance of their professional, official, or work-related duties.

2.7. The date on which the right to access personal data is granted is considered the date on which the employee provides their commitment.

2.8. The date on which the right to access personal data is revoked is considered the date of the employee's dismissal or transfer to a position that does not involve the processing of personal data.

2.9. In case of dismissal of an employee who had access to personal data or their transfer to another position that does not involve working with subjects' personal data, measures are

taken to prevent their access to personal data, and documents or other media containing subjects' personal data are transferred to another employee.

2.10. The Association keeps records of operations related to the processing of a subject's personal data and access to them. For this purpose, the Association stores information on:

- the date, time, and source of personal data collection;
- changes to personal data;
- review of personal data;
- any transfer (copying) of personal data;
- the date and time of deletion or destruction of personal data;
- the employee who performed one of the specified operations;
- the purpose and grounds for changing, reviewing, transferring, deleting, or destroying personal data.

This information is stored by the Association for one year from the end of the year in which the specified operations were carried out unless otherwise provided by Ukrainian legislation.

2.11. Personal data, depending on the method of storage (paper, electronic media), must be processed in a way that prevents unauthorized access.

2.12. To ensure the security of personal data processing, special technical protection measures are implemented, including measures to prevent unauthorized access to processed personal data and to ensure the proper functioning of the technical and software complex used for personal data processing.

2.13. The responsible person informs and advises the Association's employees on compliance with personal data protection legislation.

2.14. To fulfill these tasks, the responsible person:

- ensures the implementation of the rights of personal data subjects;
- has access to any data processed by the Association and to all premises of the Association where such processing takes place;
- in case of detection of violations of personal data protection legislation and/or this Policy, reports them to the Executive Director of the Association to take necessary measures;
- analyzes threats to the security of personal data.

2.15. The requirements of the responsible person regarding measures to ensure the security of personal data processing are mandatory for all employees involved in personal data processing.

2.16. Violations of the personal data processing and protection process must be documented by the responsible person, who organizes the work related to the protection of personal data during processing.

3. Final Provisions

3.1. This Policy is subject to regular review for improvement.

3.2. The Policy comes into effect from the date of its approval.

3.3. Members of the Association, representatives of its governing bodies, and employees may submit proposals for improving the Policy by sending their suggestions in writing to the Association's Executive Directorate. Proposals are reviewed by the Executive Directorate.

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УЧАСНИЦЬКОГО
РОЗВИТКУ
ГРОМАД



ASSOCIATION FOR
COMMUNITIES
PARTICIPATORY
DEVELOPMENT

3.4. Amendments and additions to this Policy are made by decision of the Association's Board.

**Head of the Association
Ivan Kalashnyk**

**Annex 1
to the Personal Data Processing
Policy**

**CONSENT
of the personal data subject for the collection and processing of their personal data**

I, _____,
(full name) fully in accordance with the Law of Ukraine "On Personal Data Protection," hereby give my consent for an unlimited period to the local association of local self-government bodies, "Association for Communities Participatory Development" (hereinafter referred to as the Association), for the processing of all my personal data in card files, information and telecommunication systems, electronic databases, and through other means.

I provide the Association with my general personal data, including: surname, first name, patronymic, passport details, taxpayer identification number, personal information (age, gender, etc.), autobiography, résumé, place of residence according to state registration, marital status, family composition, relatives, etc.; information on education, profession, specialty, qualification; data confirming the employee's right to social benefits established by Ukrainian legislation; electronic identification data (IP address, phone numbers, email addresses, and others); military registration information; image recordings (photos, videos, audio recordings, etc.) for the purpose of ensuring the protection and implementation of constitutional, civil-law, labor, administrative, and other relations requiring the processing of personal data, as well as for the implementation of the statutory activities of the Association.

I also consent to the Association processing (collecting, registering, accumulating, storing, adapting, modifying, updating, using, disseminating, anonymizing, destroying) my personal data in cases of: changes in the processing purpose to any other; amendments to my personal data; actions related to granting partial or full rights to process my personal data to other subjects of relations associated with personal data or unrelated to such data; dissemination of personal data, including actions related to transferring my information from personal data databases; destruction of my personal data from personal data databases; restriction of third-party access to them; amendments to my personal data.

I allow all the above actions to be carried out without my additional written or oral consent and without notifying me in any form.

I undertake to promptly provide the responsible person of the Association with updated information and submit relevant documents for updating my personal data in the Association's personal data database in case of any changes.

" " _____ 202

**** (signature) ** ** (full name)

Head of the Association
Ivan Kalashnyk