



PRIVACY POLICY FOR PERSONAL DATA PROTECTION

I. General Information

Regulatory basis: The normative basis of this Personal Data Policy includes the General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter GDPR), the Personal Data Protection Act of 01.01.2002 (amended on 26.02.2019 in accordance with Regulation (EU) 2016/679) (PDPA), and applicable implementing regulations.

Purpose: The purpose of this Policy is to ensure the protection of personal data maintained in registers by "**Arms Wide Open**" Association (hereinafter referred to as "the Association") through the provision of necessary technical and organizational measures. Personal data is collected by the Association for the purposes of performing activities provided for in the founding documents and within the framework of implementing various projects or initiatives on which the organization works.

Security: Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the Association and any subcontractor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including measures referred to in Article 32(1) of the GDPR, where applicable.

"Arms Wide Open" Association, UIC 206919286, with registered office and address of management: **BULGARIA, Sofia region, Capital municipality, Sofia, Triaditsa District, 1B Emiliyan Stanev St., floor 4,**

apt. 16, is a personal data controller within the meaning of the Personal Data Protection Act.

The website represents a platform through which **"Arms Wide Open"** Association coordinates, consolidates, and shares data and information flow regarding refugees in need of assistance, and facilitates their connection with donors, volunteers, and other persons, bodies, and organizations offering such assistance.

In carrying out this activity, **"Arms Wide Open"** Association may collect, process, use, and store personal data about users. Each data subject may voluntarily provide the necessary personal data and agree to their use and storage in accordance with the provisions of the PDPA.

For more details, questions, activities related to processing, as well as exercising your rights as a data subject, including when you wish to withdraw your consent for processing your personal data, you can contact us via:

E-mail: gdpr@armswideopen.bg

II. Basic Principles

- Personal data in the Association is processed lawfully, fairly, and transparently.
- Personal data is collected for specified, explicit, and legitimate purposes. Collected personal data is not further processed in a manner that is incompatible with those purposes.
- Personal data must be kept accurate and up to date. Inaccurate data is timely erased or rectified.
- Storage of personal data in the Association is limited to the time necessary for fulfilling the purposes provided for in law, contract with the donor, or for historical purposes.
- Personal data is processed in a manner that ensures appropriate security, for which appropriate physical, technical, and organizational measures are taken.

III. Registers Maintained by the Association

The data processed by the Association are organized in the following registers:

1. **Personnel Register** (employment and civil contracts);

2. **Contractors Register** – Legal Entities and Natural Persons under contracts for assignment of activities on projects and under contracts for supplies and services to the Association;
3. **Association Members Register**;
4. **Register of personal data of attendees** at trainings and events organized by the Association;
5. **Register of donors** and funding organizations of NGOs.

IV. Purposes and Grounds for Data Processing

Personal data stored in the indicated registers are collected and processed by the Association for the purposes of:

- Fulfillment of legal obligations;
- Performing the lawful (legitimate) activity of the organization, in accordance with the provisions of the founding documents and within the framework of the implementation of various projects and programs.

V. Data Subject Rights, Exercise and Protection

Every natural person has the following rights regarding their personal data processed by the Association:

- **Right to information:** This Policy aims to inform you in detail about the processing of your personal data;
- **Right of access to personal data:** You have the right to obtain confirmation as to whether your personal data is being processed, access to it, and information regarding its processing and your rights in this regard. You can exercise such access at any time;
- **Right to rectification:** You have the right to rectify your personal data if it is incomplete or inaccurate. You have the opportunity to rectify your data at any time by requesting us;
- **Right to erasure:** You have the right to request erasure of data, except in cases where there is a substantial ground and/or legal obligation for their processing;
- **Right to restriction of processing:** The Regulation provides for the possibility to restrict the processing of your personal data if grounds for this provided therein are present;
- **Right to data portability:** You have the right to receive the personal data you have provided and which relate to you in a structured, commonly used

and machine-readable format, as well as to use these data for another controller at your discretion;

- **Right to object to processing of personal data:** You have the right to object regarding data processed on the basis of legitimate interest;
- **Right to withdraw consent:** You have the right, at any time, to withdraw your consent for the processing of personal data which is based on consent given by you. Such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint with the supervisory authority or courts:** You have the right to lodge a complaint with a supervisory or judicial authority if you consider that the processing of personal data relating to you infringes the applicable data protection legislation. The supervisory authority in the Republic of Bulgaria is the Commission for Personal Data Protection.

The right of data subjects to information is exercised through the provision in a concise, transparent, intelligible and easily accessible form of information relating to processing. The data subject may receive the requested information by submitting an electronic application to the Association's email address.

In case of a complaint regarding the exercise of the specified rights, the data subject has the right to request a review of their case, and in case of refusal for review - to file a complaint with the supervisory authority – the Commission for Personal Data Protection.

VI. Persons Implementing and Controlling Internal Rules

Data Controller Information

Name:

"Arms Wide Open" Association

Registered Address:

Sofia, 1B Emilian Stanev St.,
entrance A

E-mail:

info@armswideopen.bg

Supervisory Authority Information

Name:

Commission for Personal Data
Protection

Address:

Sofia 1592, 2 Prof. Tsvetan
Lazarov Blvd.

Phone:

02 915 3 518

Email:

kzld@government.bg,

kzld@cpdp.bg

Website:

www.cpdp.bg

Approved by: Anna Hakman

/Chairperson of the Board of Directors/

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