Charity Organization «Charity Fund named after Avhustyn Voloshyn»

Beneficiary Personal Data Protection Policy

Approved

by decision of the Board of the Fund

Minutes No. 2 of 7 September 2026

English translation · the Ukrainian original prevails

Uzhhorod · voloshynfund.com · EDRPOU code 46220592

APPROVED
by Decision of the Board of
the Charity Organization «Charity Fund named after Avhustyn Voloshyn»
Minutes No. 2 of 7 September 2026

Charity Organization «Charity Fund named after Avhustyn Voloshyn»

BENEFICIARY PERSONAL DATA PROTECTION POLICY

1. General Provisions

1.1. This Beneficiary Personal Data Protection Policy (hereinafter — the Policy) sets out the procedure for the collection, processing, storage and protection of the personal data of persons to whom the Charity Organization «Charity Fund named after Avhustyn Voloshyn» (hereinafter — the Fund) provides charitable assistance (hereinafter — beneficiaries).

1.2. The Policy has been drawn up in accordance with the Law of Ukraine «On Personal Data Protection» and, as regards interaction with donors that require compliance with the General Data Protection Regulation (GDPR), taking into account the main principles of the GDPR (lawfulness, data minimisation, purpose limitation, storage limitation, integrity and confidentiality).

1.3. The Policy applies to all employees, volunteers and consultants of the Fund who have access to the personal data of beneficiaries in the course of their duties.

2. Principles of Personal Data Processing

2.1. The Fund processes the personal data of beneficiaries only on the following terms:

— lawfulness — processing is carried out on the basis of the beneficiary's consent, the need to perform the statutory tasks of the Fund or the requirements of law;

— minimisation — only the data objectively necessary to assess the need for assistance, to provide assistance and to report to donors are collected;

— purpose limitation — the data are used only for the purposes communicated to the beneficiary at the time of collection (provision of assistance, reporting, monitoring and evaluation) and are not used for other purposes without additional consent;

— storage limitation — the data are kept no longer than necessary to achieve the purpose of processing or than required by the donor or by the legislation on archives;

— confidentiality and integrity — the Fund takes technical and organisational measures to prevent unauthorised access to, loss or disclosure of the data.

3. Categories of Data and the Beneficiary's Consent

3.1. The Fund may collect the following categories of personal data of beneficiaries: identification data (full name, date of birth, contact details), data on socio-economic status (needed to assess the need for assistance) and, where required by the nature of the project, data on health or other sensitive categories of data, the processing of which requires the separate explicit consent of the beneficiary.

3.2. Before personal data are collected, the beneficiary (or their legal representative, for children or persons lacking legal capacity) is informed of the purpose of the data collection and of the persons to whom the data may be transferred (in particular donors, in anonymised or aggregated form unless expressly agreed otherwise), and gives consent to the processing of the data in writing or in another recorded form.

3.3. The personal data of children are processed with the additional safeguards set out in the Beneficiary Safety and Protection Policy, with the consent of their parents or legal representatives.

4. Access to Data and Transfer to Third Parties

4.1. Access to the personal data of beneficiaries is granted only to employees and volunteers of the Fund who need it to perform their duties, on the principle of minimum necessary access.

4.2. The personal data of beneficiaries are transferred to donors, partner organisations or state authorities in anonymised or aggregated form, except where the transfer of identifiable data is required by law, by the beneficiary's express consent or by the terms of a grant agreement (in which case the beneficiary must be informed).

4.3. The personal data of beneficiaries are not transferred to third parties for commercial purposes and are not used for any purposes unrelated to the statutory activities of the Fund.

5. Storage and Protection of Data

5.1. The personal data of beneficiaries are kept in paper and/or electronic form with restricted access (passwords, restricted access rights to electronic files and folders, paper records kept in locked cabinets).

5.2. If a leak of or unauthorised access to the personal data of beneficiaries is detected, the responsible person immediately informs the Executive Director, who takes measures to eliminate the consequences and, where necessary, informs the persons affected and the competent state authority for personal data protection.

6. Rights of the Beneficiary

6.1. The beneficiary has the right to access their personal data processed by the Fund, to have them corrected if they are inaccurate, and to withdraw the consent given to the processing of the data (except where the processing is required by law or is necessary for assistance already being provided).

7. Final Provisions

7.1. This Policy is approved by the Board of the Fund and communicated, against signature, to all employees and volunteers who have access to the personal data of beneficiaries.

Charity Organization «Charity Fund named after Avhustyn Voloshyn»:

Chair of the Board _____ / V.A. Moskov /

7 September 2026



Signature and seal are reproduced from the original document in Ukrainian.