

PRIVACY POLICY

Within this Privacy Policy we have tried to explain to You in the clearest way possible what information we collect, how we use it and what rights You have in relation to it. If for whatever reason any part of this Privacy Policy is not clear enough for You, please do get in touch with us at legal@helpingtoleave.org. We welcome any feedback as we care deeply about data protection and we are committed to maintaining Your trust.

1. ABOUT US

We evacuate people from areas of military conflict, namely – from Ukraine, as well as provide help and evacuate people from occupied territories and those who were forcibly displaced (deported or transferred) to Russia. Our mission is to keep people safe and meet their immediate needs. Our team of operators is on call 24/7 to provide consultation for those seeking help, and guide them through the evacuation process. We help by providing financial aid, informational support, and psychological counseling.

2. DATA PROTECTION LEGAL REQUIREMENTS

We Process your Personal Data only to the extent permissible under statutory provisions, in particular, under the Czech [Personal Data Processing Act 2019](#) (No. 110/2019 Coll.) (ZZOÚ) and the European Union's [General Data Protection Regulation](#) (Regulation (EU) 2016/679) (GDPR), which establish the legal framework for the protection of personal data of the individuals in the European Union and Czech Republic, and directly set out the rules for the processing of personal data, including Your rights. Our Data Protection Compliance Team keeps up to date with current Data Protection Laws.

Data Protection Laws introduce the concepts of a “Data Controller” and a “Data Processor”. GDPR regulates the procedures for the processing and protection of personal data by the Controller in the course of its activities, as a controller and a processor, as well as the obligations of its employees and other persons (including volunteers) involved in the processing of personal data in regard to data protection. All personal data provided to the Data Controller is confidential and may only be used for the purposes stated.

Helping to Leave acts in the capacity of a Data Controller. A Data Controller determines the purposes and means of Personal Data Processing (Art. 4(7) of GDPR) which means that we decide what, when and how we process any personal data that we receive.

The Data Controller details for our **Helping to Leave** project are as follows:

- Legal entity: **Helping to leave z.s.**
- Address: května 162/70, Hořovice, Czech Republic, 26801
- Identification Number: 170 65 925

Our lead Data Protection Supervisory Authority for the project is – the Czech Data Protection Authority ([Úřad pro ochranu osobních údajů](#)).

3. TYPES OF PERSONAL DATA

We collect, use, store and transfer different kinds of personal data depending on our relationship with You. In general, we collect the following types:

- Identity Data (e.g. first name, surname, patronymic, date of birth).
- Contact Data (e.g. phone number, email address, address, Telegram and other social network usernames).
- Communications & Marketing Data (e.g. your preferences in respect of cookies and marketing).
- Financial & Transaction Data (e.g. bank account details, invoices, payment details and history).
- Technical & Usage Data (e.g. internet protocol addresses, browser type and version, time zone settings and location and information about how You use our websites).



We also collect, use and share “Aggregated Data” such as statistical or demographic data for other purposes including research and analysis. Aggregated Data could be derived from your personal data but is not considered Personal Data under Data Protection Laws as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Technical & Usage Data to calculate the percentage of users accessing a specific page on the website. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Notice.

4. PERSONAL DATA OF WEBSITE USERS OR NEWSLETTER SUBSCRIBERS

We collect Technical & Usage Data (for tracking purposes), Identity Data, Contact Data and Communications & Marketing Data (if you decide to get in touch with us).

As you interact with our websites, we automatically collect the above stated data about You by using cookies and similar technologies. We also collect this data through our direct interactions with You, when you subscribe to our newsletters, contact us or participate in our surveys and events.

Legal grounds for Processing:

- Consent (in that you are choosing to provide us with your details so that we can contact you) in accordance with Art. 6(1)(a) of the GDPR. For our newsletters, we follow the double-opt in procedure and give you the option to unsubscribe at any point in time.
- Legitimate Interests (necessary for our Legitimate Interests in running and developing our organization and in particular, our websites) in accordance with Art. 6(1)(f) of the GDPR.
- Legal obligation (necessary for us to comply with a legal obligation such as in the instance where you no longer wish to be contacted for marketing purposes) in accordance with Art. 6(1)(c) of the GDPR.

5. PERSONAL DATA OF CANDIDATES FOR A VOLUNTEER VACANCY AND FOR JOB VACANCY

We collect Technical & Usage Data (for tracking purposes), Identity Data, Contact Data and Communications & Marketing Data (such as information submitted as part of your application to join us).

As You interact with our websites, we automatically collect this data about you by using cookies and similar technologies, as well as by means of direct interactions with you and third parties (such as recruitment agencies or your references) and when You fill out the form for a candidate for a volunteer vacancy.

Legal grounds for Processing:

- Consent (in that you are choosing to provide us with your details as part of your application) in accordance with Art. 6(1)(a) of the GDPR.
- Contract (in that we need this information to check your application and potentially enter into a contract with you) in accordance with Art. 6(1)(b) of the GDPR.

6. PERSONAL DATA OF POTENTIAL DONORS OR EXISTING DONORS

We are very grateful for those supporting our important humanitarian mission, including government agencies, multilateral institutions, foundations, the private sector and individuals.

We provide our donor community with a number of options to get involved and support the work of Helping to Leave project: through online donations and cryptocurrencies, performed through our website, through a personal relationship between you and us, contacts established on events and other occasions as well as your donations that reach us by bank transfers.

We generally process the following categories of personal data: Identity Data, Contact Data, Communications & Marketing Data, Financial & Transaction Data, Technical & Usage Data.

7. SHARING YOUR PERSONAL DATA



We transmit your Personal Data only to the extent permissible under statutory provisions or if you have given your Consent in individual cases.

We share your Personal Data with our employees in order for them to fulfill their roles and work towards our mission. All of our contractual documentation with team members, employees and volunteers includes confidentiality and data protection obligations.

We share your Personal Data with third-party organizations that we use for various purposes.

- Some of these third-party organizations act in the capacity of a Data Controller whereas others act in the capacity of a Data Processor.
- In both circumstances, we enter into the appropriate contractual documentation with our third-party organizations when sharing your Personal Data.
- For example, with any Data Processors we ensure that the contractual terms required under Art. 28 of the GDPR are incorporated.

We will only share your Personal Data when necessary and have outlined categories of recipients of third-party organizations with whom we share it with:

- Technology companies (e.g. Google, Microsoft, PandaDoc) that provide us with desktop and cloud-based products, solutions and services which we need in order to achieve our mission.
- Payment providers that we use to Process any donations received from you.
- Professional advisers such as law firms, banks and accountancy firms, as we need to engage with them for the purposes of our project.
- Data Protection Supervisory Authorities, regulators and other governmental authorities, as we need to engage with them for the purposes of them governing our operations.

We choose our service providers carefully and require all third-party organizations to respect the security of your Personal Data and to treat it in accordance with Data Protection Laws. We enter into contractual documentation with all of our third-party organizations (with the exception of Data Protection Supervisory Authorities, regulators and governmental authorities) which include the appropriate data protection clauses.

8. DATA RETENTION

We will only keep your Personal Data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, or to fulfill our (post-)contractual obligations. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you, or if you have given us your Consent to do so.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we Process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In this section we have outlined our standard retention periods for some of the Personal Data mentioned in this Privacy Notice:

- Any Personal Data in connection with a successful application for a vacancy will be stored as part of your personal file. In case it did not come to a job offer or volunteer activity we will delete your Personal Data 6 months after the end of the application process.
- Your Personal Data in our logfiles will generally be deleted after 2 months.
- As a newsletter recipient, your Personal Data will be deleted 1 year after you have revoked your Consent to receive our newsletters.
- Due to statutory storage duties Personal Data that is relevant for our financial statements may be stored for up to 10 years.



As a note, in some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information without further notice to you.

9. THE RIGHTS OF A DATA SUBJECT

Under certain circumstances, you have specific rights in respect of the Personal Data that we Process about You. The fulfilment of the legal requirements to exercise these rights must be assessed on a case-by-case basis. Your rights include:

- the right of access to the Personal Data we hold about you, in accordance with Art. 15 of the GDPR.
- the right to rectify (correct) your Personal Data where it is inaccurate or incomplete, in accordance with Art. 16 of the GDPR.
- the right to delete your Personal Data, in accordance with Art. 17 of the GDPR, but only in specific circumstances, for example where the Personal Data is no longer necessary in relation to the purpose for which it was originally collected or Processed. It may not therefore always be possible for us to delete all of the information we hold about you if you request this, for example, if we have an ongoing contractual relationship with you.
- the right to restrict Processing in specific circumstances, in accordance with Art. 18 of the GDPR, for example, while we are reviewing the accuracy or completeness of data or deciding on whether any request for erasure is valid.
- the right to data portability which means the right to receive, move, copy or transfer your Personal Data to another Data Controller, in accordance with Art. 20 of the GDPR. You have the right to this when we are Processing your Personal Data based on Consent or on a contract and the Processing is carried out by automated means.
- the right to object to Processing in cases where Processing is based upon our Legitimate Interests or where Processing is for direct marketing purposes, in accordance with Art. 21 of the GDPR.
- the right to withdraw consent to our Processing of your Personal Data, in accordance with Art. 7(3) of the GDPR, at any time with effect for the future.
- the right to lodge a complaint with the appropriate Data Protection Supervisory Authority, in accordance with Art. 13(2)(d) of the GDPR.

If you wish to exercise any of the rights set out above, please contact us by e-mail: legal@helpingtoleave.org. You will not have to pay a fee to access your Personal Data or to exercise any of the other rights.

We may need to request specific information from you to help us confirm your identity. This is a security measure in your own interest to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. It could take us longer than one month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. DATA SECURITY

We have put in place appropriate technical and organizational security measures to prevent your Personal Data from being accidentally lost, falsified, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to the team members, employees and volunteers. We have put in place guidelines, procedures and plans to deal with any suspected or actual personal data breaches. Please be aware that despite the application of due care and attention to the respective current technical standards loss of or damage to your Personal Data cannot be ruled out (especially the use of cloud-based services, email communication, mobile communication and video conferences harbor certain risks).

11. THIRD-PARTY LINKS AND SOCIAL MEDIA PLUGINS

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.



For example, when you access our websites, there may be certain components employed by Instagram, Twitter and etc. that are integrated within our websites and these components prompt your browser to download a unique identifier which give these other organizations more insight on your browsing activities, such as the specific pages on our websites that you have visited.

We do not control these third-party websites, plug-ins and applications and are not responsible for their privacy statements and the data that they collect. When you leave our websites, we encourage you to read the privacy documentation of every website you visit.

12. CONTACT US

To get in touch with our Data Protection Compliance Team, please contact us on legal@helpingtoleave.org

If you have any concerns and/or are not happy with our approach, you have the right to make a complaint to the Data Protection Supervisory Authority which is the Czech Data Protection Authority ([Úřad pro ochranu osobních údajů](#)).

Last reviewed: 12 May 2022