

DATA PROTECTION AND PRIVACY POLICY

COMMUNITY ORGANIZATION "UKRAINIAN MODERN DIGITAL SCIENCE"

1. General Provisions

1.1. This Data Protection and Privacy Policy (the **Policy**) establishes the principles, legal bases, purposes and rules governing the processing of personal data by the Community Organization "Ukrainian Modern Digital Science" (hereinafter referred to as **UMDS** or the **Organization**).

1.2. This Policy applies to the processing of personal data in the course of the Organization's activities, including:

- operation of the official UMDS website;
- scientific and research activities;
- analytical activities;
- educational and awareness-raising activities;
- international and national projects and grant programmes;
- conferences, training sessions, seminars, round tables and other events;
- surveys, questionnaires, interviews and focus groups;
- interaction with members of the Organization, experts, researchers, partners and other stakeholders;
- information and communication activities;
- publication of materials, photographs, audio and video content.

1.3. The Organization seeks to ensure an appropriate level of personal data protection regardless of the nationality or location of the data subject.

1.4. This Policy is intended to cover UMDS activities in Ukraine, interaction with individuals and organizations in the European Union and the European Economic Area (EU/EEA), as well as participation in international research, educational and other projects.

2. Information about the Organization

Name: Community Organization "Ukrainian Modern Digital Science"

Legal entity identification code: 44851106

Location for the purposes of this public Policy: Kyiv, Ukraine

Website: umdigital.science

General enquiries: hello@umdigital.science

Data Protection & Privacy: privacy@umdigital.science

The Organization determines the purposes and means of personal data processing in cases where it acts as a personal data controller.

Within individual international, grant-funded or research projects, the role of UMDS in relation to a particular processing activity may be determined by the relevant agreement, Grant Agreement, Consortium Agreement, Data Processing Agreement, Joint Controller Arrangement or another applicable project document.

3. Legal Framework

The Organization processes personal data in accordance with applicable law, including:

- the Constitution of Ukraine;
- the Law of Ukraine “On Personal Data Protection”;
- other applicable legislation of Ukraine;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (**General Data Protection Regulation — GDPR**), where the GDPR applies to the relevant processing;
- the terms of international agreements, grant agreements and research projects to which the Organization is a party or participant, insofar as they are consistent with applicable law.

The Organization also takes into account applicable recommendations and guidelines of the European Data Protection Board (EDPB) and other competent authorities in the field of personal data protection.

4. Core Principles of Personal Data Processing

UMDS follows the personal data protection principles established by the GDPR and applicable legislation.

Personal data shall be:

1. processed lawfully, fairly and transparently;
2. collected for specified, explicit and legitimate purposes;
3. adequate, relevant and limited to what is necessary in relation to the relevant purpose;

4. accurate and, where necessary, kept up to date;
5. kept in a form permitting identification of data subjects for no longer than necessary;
6. processed in a manner ensuring appropriate security, integrity and confidentiality.

UMDS seeks to apply the principles of **data protection by design** and **data protection by default**, taking into account the nature, scope, context and purposes of processing and the risks to the rights and freedoms of natural persons.

5. Categories of Data Subjects

Depending on the nature of its activities, UMDS may process personal data relating to:

- members of the Organization;
- employees and administrative staff;
- members of governing bodies;
- experts and researchers;
- participants in scientific and research projects;
- respondents to questionnaires and surveys;
- participants in interviews and focus groups;
- participants in conferences, training sessions, seminars, round tables and other events;
- authors of scientific, analytical and informational materials;
- representatives of partner organizations, universities, public authorities and international organizations;
- applicants and persons contacting UMDS;
- website visitors;
- other individuals who voluntarily interact with the Organization.

UMDS does not target children for participation in its research activities and does not conduct research involving children.

6. Categories of Personal Data

Depending on the particular activity, UMDS may process the following categories of personal data.

6.1. Identification and Contact Data

- first and last name;
- contact details;
- email address;
- telephone number, where voluntarily provided;

- organization name;
- position;
- professional or institutional affiliation.

6.2. Professional and Academic Data

- position and place of work;
- professional specialization;
- academic or professional status;
- information about participation in projects;
- authorship information;
- other professional information necessary for the relevant activity.

6.3. Research Data

Depending on the research project, such data may include:

- questionnaire responses;
- survey materials;
- interview recordings and transcripts;
- focus-group materials;
- research notes;
- information concerning financial behaviour;
- information related to research into fraud, financial crime, cybercrime, AML/CFT, digital assets and other topics within the scope of the research.

6.4. Photographic, Audio and Video Data

UMDS may create or receive photographs, audio recordings and video recordings of conferences, training sessions, round tables, interviews, focus groups, webinars and other events.

6.5. Special Categories of Personal Data

In individual research projects, UMDS may process special categories of personal data within the meaning of Article 9 GDPR only where an appropriate legal basis and applicable condition for such processing exist and suitable safeguards are implemented to protect the rights and freedoms of data subjects.

UMDS does not collect special categories of personal data where they are not necessary for a specified and legitimate research or other purpose.

7. Purposes and Legal Bases for Processing

UMDS determines an appropriate legal basis separately for each processing operation or set of related processing operations.

Depending on the circumstances, processing may be based on:

- **the data subject's consent** — Article 6(1)(a) GDPR;
- **the necessity to perform a contract or take steps prior to entering into a contract** — Article 6(1)(b);
- **compliance with a legal obligation** — Article 6(1)(c);
- **the legitimate interests of UMDS or a third party**, subject to appropriate consideration of the rights and interests of the data subject — Article 6(1)(f);
- another legal basis provided by applicable law where relevant to the particular processing activity.

Personal data may be processed, in particular, for:

- carrying out UMDS statutory activities;
- conducting scientific and analytical research;
- implementing international and national projects;
- organizing events;
- communicating with participants, experts and partners;
- responding to enquiries;
- preparing and disseminating scientific, analytical and informational materials;
- documenting the activities of the Organization;
- complying with contractual and grant obligations;
- complying with legal requirements;
- ensuring information security and protecting the rights of the Organization and other persons.

Consent is not treated as a universal or automatic legal basis for all UMDS activities. The appropriate legal basis is determined separately for each purpose.

8. Consent

Where processing is based on consent, UMDS ensures that such consent is freely given, specific, informed and unambiguous.

Where special categories of personal data are processed and consent is relied upon as the applicable condition, UMDS obtains **explicit consent** in accordance with Article 9 GDPR.

A data subject has the right to withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

Refusal to provide consent or withdrawal of consent shall not result in unjustified adverse consequences for the individual.

9. Scientific and Research Projects

UMDS gives particular attention to the protection of personal data in scientific and research activities.

Before collecting personal data within a particular research project, the Organization, depending on the nature and risks of the project:

- defines the purpose of the research;
- determines the categories of data required;
- identifies the legal basis for processing;
- determines the roles of project participants in relation to data processing;
- provides participants with appropriate information concerning the processing of their data;
- establishes retention periods or criteria;
- establishes rules governing access to research data;
- assesses the need for pseudonymisation or anonymisation;
- determines appropriate organizational and technical security measures.

Where the nature of the processing is likely to result in a high risk to the rights and freedoms of natural persons, UMDS assesses the need to carry out a **Data Protection Impact Assessment (DPIA)** pursuant to Article 35 GDPR.

Research data shall, where possible and compatible with the purposes of the research, be anonymised or pseudonymised.

Anonymous data which no longer enable a natural person to be identified directly or indirectly, taking account of all means reasonably likely to be used for such identification, are not personal data within the meaning of the GDPR.

10. Special Categories of Data in Research

Where a research project involves processing special categories of personal data, UMDS carries out a separate assessment of the necessity and lawfulness of such processing.

In addition to a legal basis under Article 6 GDPR, an appropriate condition under Article 9 GDPR must apply.

Depending on the particular project and applicable law, such a condition may include explicit consent of the data subject or another condition provided by law.

Reliance on a scientific or research purpose does not in itself exempt UMDS from the requirement to establish an appropriate legal basis and condition for processing.

Enhanced safeguards may include:

- data minimisation;
- pseudonymisation;
- restricted access;
- separation of identifying data from research data;
- encryption where appropriate;
- documentation of access;
- anonymisation of results prior to publication.

11. Informed Participation in Research

Research participants are provided, before personal data are collected, with clear and understandable information about the nature of the research and the processing of their personal data in accordance with applicable requirements.

Where processing is based on consent, participation must be voluntary.

Participants must be given an opportunity to ask questions concerning the use of their data and to exercise their rights under applicable law.

Ethical requirements for interaction with research participants and additional safeguards for vulnerable individuals are governed by the separate **UMDS Policy on Research Involving Vulnerable Participants**.

12. Website and Contact Form

The UMDS website enables users to contact the Organization through a contact form.

The following information may be collected through the form:

- contact name;
- telephone number;
- email address;
- text of the enquiry.

These data are used to receive, review and respond to enquiries and, where necessary, for subsequent communication relating to the enquiry.

Users are advised not to include special categories of personal data or other confidential information in their enquiry unless such information is necessary for the purpose of the communication.

13. Cookies and Tracking Technologies

As of the date of approval of this Policy, UMDS does not use Google Analytics, Meta/Facebook Pixel, LinkedIn Insight Tag or other marketing or behavioural tracking tools known to the Organization on its website.

UMDS does not use optional analytics or marketing cookies requiring the user's prior consent unless users are expressly informed otherwise.

The website may use strictly necessary technologies required for its proper operation or security.

If optional cookies or similar technologies are introduced, UMDS will update the relevant information and, where required by applicable law, provide an appropriate mechanism for obtaining and withdrawing consent.

14. Social Media and External Websites

The UMDS website contains links to the Organization's official Facebook and LinkedIn pages.

When a user follows such a link, they interact with a separate external platform. Personal data processing by that platform is governed by its own terms and privacy policies.

UMDS does not control all personal data processing operations independently carried out by external platform providers.

Where, in a particular situation, UMDS and a social media platform provider act as joint controllers in respect of a particular processing activity, UMDS fulfils the obligations imposed on it by applicable law.

15. Photographs, Audio and Video Materials

UMDS may photograph and make video recordings of its own conferences, training sessions, seminars, round tables and other events and may also receive such materials from partners.

These materials may be used for:

- documenting the Organization's activities;
- project reporting;

- scientific and educational activities;
- public communication and coverage of events.

The relevant legal basis is determined according to the nature of the event, the manner in which the materials are used, the reasonable expectations of participants and applicable law.

Where UMDS relies on an individual's consent for a particular photographic, audio or video processing activity, such consent is obtained in accordance with this Policy and applicable law.

Interviews, focus groups and other research sessions are recorded only after participants have been appropriately informed and where an appropriate legal basis exists.

16. Publication of Personal Data

UMDS may publish on its website and official information resources professional information concerning members of the Organization, experts, authors, researchers, speakers and other individuals, including:

- first and last name;
- position;
- professional or institutional affiliation;
- authorship;
- professional biographical information;
- photograph.

The amount of personal data made public must correspond to the purpose of publication and the principle of data minimisation.

17. Recipients of Personal Data

In the course of legitimate UMDS activities, personal data may be made available or transferred to:

- authorized members of UMDS governing bodies;
- administrative staff;
- researchers and project team members on a need-to-know basis;
- partners in international and national consortia;
- universities and research institutions;
- organizers of joint events;
- the European Commission, executive agencies and other EU bodies where required under relevant projects or grant agreements;

- providers of IT, hosting, communication or other services where necessary for UMDS activities;
- public authorities and other persons where disclosure is required by law.

Personal data are transferred only to the extent necessary for the relevant legitimate purpose.

18. Controllers, Joint Controllers and Processors

Depending on the particular project, UMDS may act as:

- a controller;
- a joint controller together with one or more partners;
- a processor acting on behalf of another controller.

The roles and responsibilities of the parties are determined taking into account the actual allocation of decision-making concerning the purposes and means of processing and, where necessary, are formalised in appropriate agreements.

Where UMDS engages a processor, the Organization takes appropriate steps to ensure sufficient guarantees for the protection of personal data and concludes the agreements required by applicable law.

19. International Transfers of Personal Data

Due to the international nature of UMDS activities, personal data may be transferred or made accessible to recipients in other countries.

Where the GDPR applies, transfers of personal data from the EU/EEA to a third country or international organization are carried out in accordance with Chapter V GDPR.

Depending on the circumstances, UMDS may rely on:

- European Commission adequacy decision;
- Standard Contractual Clauses (SCCs);
- other transfer mechanisms provided for under the GDPR;
- applicable derogations in cases expressly provided for by the GDPR.

Where necessary, UMDS assesses the circumstances of an international transfer and implements supplementary safeguards.

20. Retention of Personal Data

UMDS does not retain personal data for longer than necessary for the purpose for which they were collected, unless a longer retention period is required by law or by grant, contractual or other legitimate requirements.

In determining retention periods, UMDS considers:

- the purpose of processing;
- the nature and volume of the data;
- risks to the rights and freedoms of individuals;
- legal requirements;
- grant and contractual requirements;
- requirements relating to research integrity and verifiability of research results;
- the need to protect legitimate rights and interests.

At the end of the applicable retention period, personal data are deleted, securely destroyed or anonymised unless there is a lawful basis for further retention.

Specific retention periods may be established for individual projects.

21. Security of Personal Data

UMDS applies organizational and technical measures designed to protect personal data against:

- unauthorized access;
- unlawful use;
- accidental or unlawful destruction;
- loss;
- alteration;
- unauthorized disclosure.

Access to personal data is provided only to persons who require such access for the performance of their functions.

Depending on the nature and risks of processing, measures may include access controls, backups, pseudonymisation, encryption and other appropriate safeguards.

22. Personal Data Breaches

Where a personal data breach is identified, UMDS:

1. assesses the nature and scope of the breach;
2. takes measures to stop the breach and mitigate its consequences;
3. documents the incident;
4. assesses risks to the rights and freedoms of natural persons;
5. where required by applicable law, notifies the competent supervisory authority;
6. where required by law, notifies affected data subjects.

Where the GDPR applies, notifications are made in accordance with Articles 33 and 34 GDPR.

23. Rights of Data Subjects

Where the GDPR applies to the relevant processing, a data subject may, depending on the circumstances, have the right to:

- receive information about the processing of their personal data;
- access their personal data;
- request rectification of inaccurate or incomplete data;
- request erasure of personal data;
- request restriction of processing;
- object to processing;
- receive data in a portable format where provided for by the GDPR;
- withdraw consent where processing is based on consent;
- not be subject to a decision based solely on automated processing where such decision produces legal effects or similarly significantly affects them within the meaning of the GDPR;
- lodge a complaint with a competent supervisory authority.

These rights are not absolute and may be subject to limitations provided by applicable law, including in the context of scientific research where the relevant legal conditions and safeguards apply.

24. Exercising Data Protection Rights

To exercise data protection rights or obtain information about personal data processing, an individual may contact UMDS at:

privacy@umdigital.science

The request should contain sufficient information to enable UMDS to identify the relevant processing activity or project.

UMDS may request additional information necessary to verify the identity of the applicant where there are reasonable doubts concerning identity.

Requests are handled within the time limits established by applicable law.

UMDS does not charge a fee for the exercise of rights except where applicable law permits a reasonable fee due to the manifestly unfounded or excessive nature of a request.

25. Complaints

If an individual believes that their personal data are being processed in breach of applicable law, they may contact UMDS at:

privacy@umdigital.science

UMDS seeks to consider such concerns fairly, objectively and without undue delay.

Where the GDPR applies to the relevant processing, the individual also has the right to lodge a complaint with a competent data protection supervisory authority pursuant to Article 77 GDPR.

26. Automated Decision-Making

As of the date of approval of this Policy, UMDS does not carry out solely automated decision-making, including profiling, that produces legal effects concerning individuals or similarly significantly affects them within the meaning of Article 22 GDPR.

If such processing is introduced, UMDS will ensure compliance with applicable legal requirements and provide appropriate information to data subjects.

27. Responsibility for Personal Data Protection

Overall responsibility for organizing the implementation of this Policy within UMDS rests with the **Head of the Organization**.

As of the date of approval of this Policy, UMDS has not appointed a separate Data Protection Officer (DPO).

For all matters relating to personal data, exercise of rights, confidentiality and reports of possible data protection breaches, the following dedicated address is used:

privacy@umdigital.science

UMDS periodically assesses whether appointment of a DPO is required, taking into account the nature, scope and systematic nature of its processing activities and the requirements of applicable law.

28. Responsibilities of Persons Involved in UMDS Activities

Members of governing bodies, administrative staff, researchers, experts and other persons who obtain access to personal data in connection with UMDS activities are required to:

- use personal data only for authorized purposes;
- maintain confidentiality;
- refrain from disclosing data to unauthorized persons;
- comply with applicable information security requirements;
- report known or suspected personal data breaches;
- comply with this Policy and any specific requirements applicable to the relevant project.

29. Accountability and Documentation

UMDS seeks to maintain appropriate evidence of compliance with personal data protection principles.

Depending on the nature and scale of processing, the Organization may maintain:

- documentation of processing activities;
- privacy notices and information materials for participants;
- consent forms;
- processor agreements;
- joint controller arrangements;
- risk assessments and DPIAs;
- personal data breach documentation;
- data retention and deletion rules;
- other documentation necessary to demonstrate compliance with applicable requirements.

30. Amendments to the Policy

UMDS may review and update this Policy in response to:

- changes in legislation;
- changes in guidance issued by competent authorities;

- changes in the Organization’s activities;
- introduction of new technologies;
- commencement of new types of research or project activities;
- changes in the methods of personal data processing.

The current version of the Policy is published on the official UMDS website.

The version number and effective date are indicated at the beginning of the document.

31. Contact Information

COMMUNITY ORGANIZATION “UKRAINIAN MODERN DIGITAL SCIENCE”

Identification code: **44851106**

Kyiv, Ukraine

Data Protection & Privacy: privacy@umdigital.science

General enquiries: hello@umdigital.science

Website: umdigital.science