EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (GDPR)

In connection with the adoption of the new law of Act no. 18/2018 on the protection of personal data, effective from 25 May 2018 and EU Regulation No. 2016/679 on GDPR, you will find in this document all necessary information that describes how we use the personal information we collect about you.

The following information applies to the entire association of V.I.A.C. - Institute for Youth Support and Development (hereinafter referred to as V.I.A.C.) and at the same time each its internal component without its own legal personality: AAPO - Center for non-formal and informal learning, Sinaj Community Center, Sinaj City Hub, Zilina Volunteer Center, Oravské Center of Youth, EDIC Trstená.

V.I.A.C. in the processing of personal data must ensure that the personal data are processed only legally and that there is no violation of the fundamental rights of the person concerned or of any natural person whose personal data are in V.I.A.C. processes.

WHO WE ARE?	2
WHAT PERSONAL DATA DO WE PROCESS?	2
WHEN ARE PERSONAL DATA PROCESSED?	2
How do we use your personal data?	3
LEGAL BASIS FOR PROCESSING PERSONAL DATA	3
WHAT ARE THE RIGHTS OF THE PEOPLE IN QUESTION?	5
WHOM DO WE PROVIDE PERSONAL DATA?	8
How do we protect your personal data?	9
How long do we store your personal data?	9
DISTRIBUTION OF NEWSLETTER	9
USING WEBPAGES	10
SECRECY	10
DO YOU NEED HELP?	11

WHO WE ARE?

V.I.A.C. - Institute for Youth Development and Support Ústie nad Priehradou 41, 028 01, TrstenáICO: 42 217 202DIC: 2023 297 287Date of origin: 17th of Juny 2011

WHAT PERSONAL DATA DO WE PROCESS?

The categories of personal data we process include:

- the name and surname of the members of the organization and participants of programs and events that are not members of the organization,
- the date of birth of members of the organization and of participants in programs and events that are not members of the organization,
- address of permanent residence of members of the organization and participants in programs and events that are not members of the organization,
- contact details, including e-mail and phone numbers, organizational members and participants in programs and events that are not members of the organization,
- the name and surname and contact details of a legal representative of a person below the age of 18 who is a member of the organization or participants of the programs and events organized by the organization,
- health data of members of the organization and participants of programs and events to the extent necessary to ensure the protection of the health and life of members of the organization and participants in the events organized by the organization,
- personal data and health data necessary to provide services in a community center in accordance with valid legislation,
- a photo if the volunteer decides to publish it in the Volunteer Opportunities Database,
- personal data if we have a contract together to the extent specified in the contract,
- information from which your interests can be deduced, preferences (the cities you publish and the volunteer preferences that you can choose in a database of volunteer opportunities), if you are registered in a database of volunteer opportunities.

WHEN ARE PERSONAL DATA PROCESSED?

V.I.A.C. acquires personal data only for a specific, expressly stated and legitimate purpose. You provide us with your personal information:

- for a written or electronic registration as a member of an organization,
- for registration on an event organized by an organization,
- when you signing up for our newsletter,
- when signing the attendance list on any of our organized programs and events,
- when ordering and using our services or the goods we offer,
- when using our accommodation and catering services at the Orava Youth Center,
- when registering to our database of volunteer opportunities through the website,

- if you are our volunteer,
- if you are a community center customer,
- if you have supported us financially,
- if you contacted us via email,
- if you are a visitor to our website,
- if you have signed a contract with us.

HOW DO WE USE YOUR PERSONAL DATA?

We use your personal information at:

- registration of the members of the organization,
- registration of participants organized by the organization,
- ensuring the protection of the health and life of participants in events organized by the organization,
- providing information about the organization's activities, planned activities and events,
- evidence of volunteers working with the organization,
- processing of contractual and pre-contractual obligations,
- processing of personnel and payroll,
- processing the accounting agenda,
- security of OSH, Fire protection,
- asset and security protection,
- making orders, ordering services and delivering orders to a contact address
- demonstrating the implementation of events organized by the organization by individual donors who contributed financially to the implementation of the events,
- marketing purposes and communication with you,
- communicating with our supporters, donors, or people who are interested in our activity regarding their support and our follow-up,
- administration our website and our social networking accounts to view the content of your site and accounts as efficiently as possible, based on data testing and analysis,
- analyzing, evaluating and improving our activity and our events,
- solving your complaints.

LEGAL BASIS FOR PROCESSING PERSONAL DATA

The legal basis for our processing of personal information depends on the purpose for which we process your data. We process your personal data, in particular, on the basis of the consent you have given us. We will always ask you for consent to the processing of your personal data in those cases where we have a legal obligation to do so. If you are a donor, you have supported our activities, and in this way you have expressed our support for our activities, we consider our legitimate interest in informing you of what we are doing.

We also derive our legitimate interest from the publicly beneficial purpose of our organization, which is listed in the charter of our organization. In order to achieve this, we also need to inform the

public about the issues we are addressing and therefore we consider our legitimate interest in informing all our supporters and disseminating this information.

If you have such as a donation, a working contract, a volunteer agreement, or another with V.I.A.C., we process your data under an agreement.

We also process your data based on the following legal bases:

- registration of current members of the organization Act no. 83/1990 Coll. on association of citizens stipulates the obligation to keep records of members of the association,
- registration of participants (according to the donor's instructions, which demonstrate the performance of the activity) there is a legitimate interest of the organization in collecting these data in order to declare the donor the realization of the event and to demonstrate that a particular person participated in the event. The goal is to get funding for the organization's activities,
- information of the health status of participants in residential events (information on allergies to food and medicines, chronic diseases and regularly used medicines) we collect to ensure the protection of the life and health of the participants themselves,
- registration of volunteers, if they are not members of the organization related to fulfillment of tasks according to Act no. 282/2008 Coll. on youth work, which sets out certain obligations for the organization in relation to volunteers that we are unable to meet without collecting their data (for example, for issuing a certificate of voluntary activity, etc.)
- registration of clients of the Community Center related to fulfilling the tasks of the Community Center under the Social Services Act no. 448/2008 Coll. as amended,
- registration of clients of the Orava Youth Center related to the provision of accommodation services and is necessary for the fulfillment of the legal obligation under Art. 6 ods. (1) c) Regulations, in particular Act no. 40/1964 Coll. Civil Code, as amended, § 24, point 1 Act no. 253/1998 Coll. on the Reporting of the Residence of the Citizens of the Slovak Republic and the Registers of the Population of the Slovak Republic, as amended, Act no. 404/2011 Coll. on the Residence of foreigners and on amendments to Certain Acts as amended, Act on Local Fees no. 582/2004 Coll. as amended,
- e-mail addresses to which we send a newsletter and other regular information about the organization's activities We process it on the basis of a prior consent of a member of the organization, participant, legal representative of a member of the organization or participant, volunteer or other person who logs in to the newsletter via the organization's website,
- registration of former members of the organization and registration of participants from previous years we only do so if there is a legitimate interest of the organization in demonstrating the number of members of the organization and participants in the organization's events. The Ministry of Education, Science, Research and Sport of SR and Iuventa the Slovak Youth Institute or other donor has committed us in a contract to provide financial support for our activities and existence to keep older data on members of the organization and participants in retrospective funds. If we did not keep the data requested by them within the set time, we would risk returning the funds provided by the donor. For this reason, there is a legitimate interest of the organization in storing these data for the period specified in the relevant grant agreements. The

retention period of these older data is usually between 5 and 10 years. After this time, we will always review whether the data needs to be retained and, if we judge that it is no longer necessary, we will cease processing these personal data,

• special legislation, in particular: the Personal Data Protection Act, the Social Insurance Act, the Labor Code, the valid pay and accounting regulations, the Commercial Code, the Civil Code, the Trades Licensing Act, the Act on the Protection of Health and Safety at Work, and the development of public health

WHAT ARE THE RIGHTS OF THE PEOPLE IN QUESTION?

This is a summary of your rights regarding the protection of your personal information. Individual rights are not absolute and are responsible for certain exceptions or limitations.

• *Right for information*

You have the right to receive clear, transparent and understandable information about how we use your personal information and what rights you have. That is why we provide this information. Before you can apply any of the following rights, please contact us on V.I.A.C., P.O.BOX 11 028 01 Trstená or electronically at office@ozviac.sk.

You have the right to receive your personal information free of charge, except in the following cases, when we may charge a reasonable fee to cover our administrative costs associated with the provision of personal data:

- unjustified or disproportionate / repeated requests,
- other copies of the same data.

We also have the right to refuse these requests. Please consider your application thoroughly. We will respond as soon as possible. In general, it will be within one month of receiving the request and your successful identification, but if we have to take longer to complete the request, we will inform you.

• Right for access - OBTAINING ACCESS TO YOUR DATA

You have the right to access your personal data (if we process it) and to other information about the processing of your personal data (similar to the one in this information list). This is so that you can check that we use your personal information in accordance with our privacy policy.

• You can request access

You have the right to:

- confirmation that we process your personal information,
- access to your personal data,
- further information on the processing of your personal data (most of which are probably already listed in this information list),

requesting copies of documentary or electronic records that we process, share, or use about you.
In order to comply with your request, we may ask you to prove your identity and personal information to help us find the personal information you request.

• When access will not be allowed

We can only provide you with your data, but not the personal information of others. Also, in cases where the access would adversely affect the rights of another person, we are not obliged to allow you this kind of access. In your request for access, clearly identify the personal data you are requesting access to. If there are any doubts, we may contact you with the request to refine the information you require.

• Right to Repair - REPAIR OF YOUR DATA

You have the right to have your personal information corrected if it is incorrect or incomplete. You have the right to correct improperly personal information relating to you without undue delay. If you tell us that your personal information about you is incorrect, we will review it and if we do the same, we will fix our notation. If we do not agree with you, we'll let you know. If you wish, you can tell us in writing that our notes you still find incorrect and we will attach your views to your personal data whenever we provide them to entities outside of the organization.

You also have the right to complete your personal information, including by providing a supplementary statement. Whether it is possible, will depend on how your personal data is processed. Any third parties with whom we shared your personal information (see "Whom do we provide your personal information?"), We will have to notify you that you have requested a correction.

How to view and fix your data

If you ask us in written form, we will generally allow you to view the personal data we process about you or take steps to correct the incorrect data.

• Right to delete your data - DELETION DATA

This right is also known as the "forgiveness" and in simple terms allows you to request the deletion or removal of your personal information if there is no compelling reason to continue using it. But it is not an absolute right. We may have the right or the obligation to keep such data, for example, if we have a legal obligation to do so or if we have another legitimate reason for keeping your data.

When you can request deletion

With the exceptions in the "When can we reject a deletion request?", you have the right to deletion your personal information and prevent further processing, in the following cases:

personal data are no longer needed for the purposes for which they were originally acquired / processed,

- you withdraw consent (if you have previously been granted and required to process your data),
- you object to processing, and our legitimate interest in the possibility of further processing your data will not prevail,
- we have processed your personal information contrary to the privacy laws,
- personal information must be deleted to comply with the legitimate obligation.

When can we reject a deletion request?

The right of deletion does not apply in cases where your data is processed for specific purposes, including the enforcement or defense of legal claims or the performance of a contract for the provision of veterinary care. We may delete the data provided for marketing purposes (if you have agreed to this).

• Right to limit processing - LIMITATION OF PROCESSING YOUR DATA

In some situations, you have the right to "block" or restrict the further use of your personal information. If processing is limited, your personal information may be retained but may not be used anymore. In order to ensure that such requests are respected in the future, we are carrying a list of people who asked us to block the further use of their data.

When it is possible to limit processing

You have the right to limit the processing of your personal data:

- if you do not agree with the accuracy of the data. Then we have to restrict the process if we do not verify the accuracy of the data,
- if the processing is illegal and you have reservations about deletion instead of request a limitation of processing,
- if you object to the processing that occurs for the purposes of our legitimate interests within the meaning of the "Eligible interests" section of the "Submission of objections to processing" and we are considering whether these interests are preferred.

When do we need to inform other recipients of your personal data about processing restrictions

If we have provided your personal information to third parties, we need to inform you about the limitations so that your data will not continue to be processed. We will take appropriate action for this purpose. If we decide to cancel the processing restriction, we will notify you.

• Right to data portability - TRANSFER OF YOUR PERSONAL DATA

You have the right to obtain a copy of some of the personal data we have collected about you and use it or share it for your own purposes.

When the right to data portability can be exercised

The right to data portability applies only to:

- the personal information you have provided to us (i.e., no other data),

- in cases where processing is based on your consent or performance of the contract, and processing is performed by automated resources.

When can we refuse the request for data transfer?

Your request for data transfer may be rejected if processing does not meet the above criteria in the given case. We will also not be able to provide you with personal data in cases where more than one person is concerned and their rights would be affected by these rights.

• Right to objections - SUBMITTING OBJECTIONS TO THE PROCESSING YOUR PERSONAL DATA

You have a right to object to some types of processing, including processing for direct marketing purposes (which we only do with your consent).

You can file a complaint against processing in the following cases:

- legitimate interests,
- against a processing based on our legitimate interests, you have the right at any time to object for reasons relating to your specific situation. If we are able to demonstrate a convincing legitimate reason for the processing of your personal data that overrides your interests, rights and freedoms, or if we need your personal data to claim or defend your claims, then we may further process your data. Otherwise, we need to stop processing this data.
- newsletter you have the right at any time to object to the processing of your personal data for the purpose of sending the newsletter. If you have subscribed to newsletters or other news, you can sign out of this subscription at any time by clicking on the link subscription emails located at the bottom of each email you receive from us. You can also tell us your decision by e-mail at <u>office@ozviac.sk</u>.

For further information and advice on personal data and your rights, please contact: Office for Personal Data Protection, Hraničná 12, 820 07 Bratislava, tel. No .: + 421-2-3231-3220, e-mail: statny.dozor@pdp.gov.sk, web: <u>www.dataprotection.gov.sk</u>.

WHOM DO WE PROVIDE PERSONAL DATA?

We provide personal data to third parties:

- if required by applicable law,
- only according to the program and event, for example, the mentor, the supervisor, the interpreter, the co-operating partner, the guarantor, or, to a very limited extent the donors of the program, in particular the institutions,
- entities that provide funding for our activities and events, in particular the Ministry of Education, Science, Research and Sport of the SR, Iuventa - the Slovak Youth Institute, and other donors of grant schemes through which we implement programs and activities,
- companies that process our IT systems,
- if you need health care during the event,

We use specific products and services from other companies to secure certain activities (such as keeping a database of contacts, distributing mass e-mail communications). These are the so-called intermediaries and may come into contact with your personal information. They are professional companies that protect personal data at the highest level. They are:

- Mailchimp The Rocket Science Group, LLC, 512 Means Street, Suite 404, Atlanta, GA 30318, USA
- Google Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043 USA,
- Mastan s.r.o. Moravská 2567/6, 052 01 Spišská Nová Ves,
- Darujme.sk Center for Philanthropy, n.o., Baštova 5, 811 03 Bratislava,
- Accrual s.r.o. Odbojárov 1958/14, 026 01 Dolný Kubín,
- WebSupport s.r.o. Old Grunty 12, 841 04 Bratislava.

In addition to our intermediaries, we may disclose or make available your personal information by court or other governmental authority authorized to request disclosure and / or disclosure and, in accordance with the obligation imposed by the relevant legislation.

HOW DO WE PROTECT YOUR PERSONAL DATA?

The security and confidentiality of your personal data is extremely important to us. We protect the personal data that we have at our disposal to the fullest extent possible, prior to their escape, misuse or damage. To your personal data have access a limited number of workers who have been trained on how to deal with them and how to protect them. We have established technical, administrative and physical safeguards that:

- protect your privacy against unauthorized access and abuse,
- provide our IT systems and protect information in them,
- ensure that we can restore your data in situations where it may be damaged or lost.

Where is it appropriate, we use encryption or other security measures that we deem reasonable to protect your data. We also regularly review our security practices to consider whether it is appropriate to introduce new technology or update procedures. Despite our efforts, however, no security measure is perfect or unbeatable.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

Our internal regulations on the retention of personal data comply with all applicable privacy and privacy policies that apply to us. The periods during which different types of data can be stored and are regularly reviewed are determined. Data that we no longer need according to our time limits set out in our rules will be discarded in a safe and reliable manner.

DISTRIBUTION OF NEWSLETTER

We regularly send you newsletters about organization's activities and upcoming events to your email addresses, we will send you invitations to events and other offers that may be of interest to you and related to the activity of our organization or its partner organizations. If you do not want to receive more information from us, we offer you simple ways to end their sending:

- every time you get a message, you'll also see the opt-out information,
- let us know in writing or by mail that we stop sending you further messages.

Agreeing with the processing of personal data for newsletters is recorded using MailChimp. We also use MailChimp to send electronic newsletters. MailChimp is a service provided by The Rocket Science Group, LLC, 512 Means Street, Suite 404, Atlanta, GA 30318, USA. The data stored at registration will be stored on a server operated by The Rocked Science Group, LLC in accordance with GDPR and EU-US Privacy Shield. More information about the privacy of MailChimp is available on it's site. Further information on the EU-US Privacy Shield is available on the European Commission's website.

USING WEBPAGES

The websites managed by V.I.A.C. use:

- so-called "cookies", which are small text files downloaded from your internet browser and stored on your computer. Cookies serve to recognize our repeated visits to our websites and to improve the services provided by these websites. In addition, cookies also serve to transfer information that automatically recognizes you. Recognition is through an IP address stored in cookies. This information serves only to improve our services and to speed up your access to the named websites. You can make it impossible to download cookies to your computer by modifying your internet browser settings. The use of cookies for the purpose of measuring traffic to our site is considered to be our legitimate interest.
- Google Analytics for Website Analysis, provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043 USA. Google Analytics. It uses cookies to allow you to analyze the use of these websites. Cookie-generated information (for example IP address, time, location, and frequency of website visits) is transmitted to Google Inc.'s place of residence. V.I.A.C. uses Google Analytics with IP address anonymization. Each IP address is so abbreviated for anonymization before it is transferred out of the EU. Your data is used solely to analyze the use of the Web sites managed by Google Inc. it never correlates this data with other data you have Google Inc. provided. We consider our use of Google Analytics to be a legitimate interest for the purposes of measuring our site traffic.

The policy does not apply to any other sites managed by other organizations, partners of V.I.A.C. or by any other third parties that are governed by their own policies.

SECRECY

We assure you that our staff and associates who come in contact with your personal information are trained to handle personal data in order to ensure maximum protection and are bound by the confidentiality of personal data. It lasts after the end of our cooperation. In addition to our staff, associates and intermediaries, no third party accesses your personal data unless it is necessary to fulfill the purpose for which you have provided us with the personal data.

DO YOU NEED HELP?

If you need help with our information or have any questions about this information, please contact us at: office@ozviac.sk or at the address: V.I.A.C. - Youth Support and Development Institute, Ústie nad Priehradou 41, 028 01 Trstená, or by phone: +421 948 84 99 22.

If you are not satisfied with the way we collect, share or use your personal information, we would be glad to inform us. You can contact us at the address listed above. If you are not satisfied with our response, you have the right to file a complaint with the Office for the Protection of Personal Data, based in Hraničná 12, 820 07 Bratislava, tel. No .: + 421-2-3231-3220, e-mail: statny.dozor@pdp.gov.sk.

This processing and protection of personal data is valid from 25.5.2018. Any future changes to the above information will be provided on this website and, if necessary, will be communicated to you by email.