

PRIVACY POLICY

and personal data protection

This Policy explains what personal data the Foundation collects, why it uses it, to whom it may transfer it, and what rights the user has.

1. General provisions

1.1. This Privacy and Personal Data Protection Policy (hereinafter referred to as the "Policy") defines the procedure for collecting, using, storing, transferring and protecting personal data when using the website <https://repowerua.org> (hereinafter referred to as the "Site"), making charitable donations, filling out forms, correspondence and other interaction with the Foundation.

1.2. The owner of personal data is the CHARITY ORGANIZATION "CHARITABLE FOUNDATION "REPOWER UKRAINE FOUNDATION", EDRPOU code 45127019, address: 01001, Ukraine, Kyiv, Lyuteranska st., building 3 (hereinafter referred to as the "Foundation").

1.3. The Policy has been developed in accordance with the Constitution of Ukraine, the Law of Ukraine "On Personal Data Protection", other requirements of Ukrainian legislation, as well as taking into account the principles of the EU General Data Protection Regulation (GDPR) in cases where it applies.

1.4. By using the Site, providing data or making a donation, the person confirms that he/she has read this Policy. If the processing is based on consent, the person may withdraw it in the manner specified in this Policy.

2. What data can the Foundation receive?

2.1. Depending on the method of interaction, the Fund may process:

- first and last name, name of organization, country of residence or registration;
- telephone number, email address and other contact details;
- information about the donation: date, amount, currency of payment initiation, hryvnia amount credited to the Fund, payment method, transaction identifier and payment purpose;
- limited payment information transmitted by the bank or payment service, including a masked card number, transaction status, and data required to record the payment;
- the content of appeals, correspondence, applications, questionnaires, messages and documents that a person voluntarily sends to the Fund;
- technical data: IP address, browser and device type, operating system, language, time of visit, pages viewed, cookies and similar identifiers.

2.2. The Fund does not receive or store full payment card details, CVV/CVC code or bank account password. Such information is processed directly by the bank, HUTKO, PayPal or other payment service in accordance with its rules.

2.3. Please do not send special categories of personal data (including medical data) unless it is necessary for a specific Foundation program and has not been specifically requested by the Foundation.

3. What is the data used for?

3.1. The Foundation processes personal data for the following purposes:

- receiving, confirming, recording and administering charitable donations;

- execution of a public offer to make a charitable donation;
- payment identification, prevention of errors, fraud and abuse;
- responding to inquiries and maintaining communication with donors;
- sending news and messages from the Foundation with appropriate consent;
- implementation of charitable programs, projects, events and volunteer initiatives;
- maintaining accounting and tax records, reporting and compliance with legal requirements;
- ensuring the operation, security, analytics and improvement of the Site.

3.2. The Foundation does not sell personal data or use it for purposes incompatible with this Policy.

4. Legal basis for processing

4.1. Depending on the situation, the Fund processes data on the basis of:

- the consent of the person;
- the need to conclude and execute a charitable donation agreement or take actions at the request of a person prior to its conclusion;
- fulfillment of obligations established by the legislation of Ukraine;
- the legitimate interest of the Foundation, in particular to ensure the security of the Site, prevent fraud, conduct proper communication and protect the rights of the Foundation, unless such interest is overridden by the rights and freedoms of the individual.

5. Payment services and currency donations

5.1. Online donations may be processed by banks, HUTKO, PayPal and other payment providers. They are separate data processors and apply their own privacy policies and security rules.

5.2. If a donation is initiated from a card or account in a foreign currency, the bank or payment service may convert it into hryvnia. The Foundation receives only the information about the transaction that is necessary for its confirmation, crediting, and accounting.

5.3. The Fund recommends that the user familiarize themselves with the privacy policy of the selected bank or payment service before making a payment.

6. To whom may data be transferred?

6.1. The Foundation may provide access to personal data only to the extent necessary for the specified purpose, to the following recipients:

- banks, payment systems and payment processing services;
- hosting, email, analytics, CRM and technical support providers;
- auditors, accountants, lawyers and other professional consultants who have a duty of confidentiality;
- to state bodies, courts and law enforcement agencies - only in cases and in accordance with the procedure provided for by law.

6.2. Persons processing data on behalf of the Foundation must apply appropriate organizational and technical protection measures and use the data only for agreed purposes.

7. International data transfers

7.1. Certain providers of payment, cloud, analytical or communication services may process data outside of Ukraine. In such cases, the transfer is carried out only if there is a legal basis and appropriate data protection guarantees.

7.2. For individuals located in the European Economic Area, the relevant international transfer mechanisms provided for by the GDPR apply if it applies to the specific processing.

8. Cookies and analytical technologies

8.1. The site may use necessary cookies for correct and secure operation, as well as, if necessary, analytical and functional cookies for statistics and improving the user experience.

8.2. Necessary cookies are used without separate consent, where permitted by law. Other cookies are activated based on the user's consent, where such consent is required.

8.3. The User can change the cookie settings in his browser. Disabling individual cookies may affect the operation of some functions of the Site.

9. Data retention period

9.1. The Fund stores personal data for no longer than is necessary for the purposes of processing them, unless a longer period is required by law or is necessary for the establishment, exercise or defense of legal claims.

9.2. Payment, accounting and reporting documents are stored for the periods specified by the legislation of Ukraine. Data for newsletters are stored until consent is withdrawn or the relevant newsletter is terminated.

9.3. After the expiration of the storage period, the data is deleted, destroyed or depersonalized, unless otherwise provided by law.

10. Protection of personal data

10.1. The Foundation applies reasonable organizational and technical measures to protect data against accidental loss, unauthorized access, alteration, disclosure or destruction. Access to data is provided only to employees and contractors who need it to perform their functions.

10.2. No method of transmitting or storing data on the Internet can guarantee absolute security. In the event of an incident, the Foundation acts in accordance with applicable law and takes measures to minimize the possible consequences.

11. Individual rights

11.1. A person has the right, within the limits of applicable law:

- to know about the sources of collection, place of storage, purpose and composition of their data;
- access your personal data;
- request correction of inaccurate or outdated data;
- withdraw consent to data processing if the processing is based on consent;
- to request the deletion or restriction of data processing in cases provided for by law;
- object to processing based on legitimate interest;
- file a complaint with the Commissioner for Human Rights of the Verkhovna Rada of Ukraine or another competent supervisory body.

11.2. For data protection purposes, the Foundation may request confirmation of the applicant's identity. The Foundation shall consider the application within the time limits established by applicable law.

11.3. Withdrawal of consent does not affect the lawfulness of processing carried out prior to its withdrawal and does not oblige the Fund to delete data that it is required to store by law.

12. Information messages

12.1. The Foundation may send news, reports and information about projects with the consent of the recipient or other lawful basis.

12.2. You can opt out of receiving newsletters by clicking the link in the message or by contacting the Foundation's email address. Service messages related to a donation or appeal are not considered marketing mailings.

13. Third-party resources

13.1. The Site may contain links or embedded elements of third-party resources, including social networks, YouTube, banks and payment services. The Foundation does not control their data processing. Their own policies apply to such resources.

14. Changes to the Policy

14.1. The Fund may periodically update this Policy. The current version is published on the Site with the date of update.

14.2. If the changes significantly affect the rights of users, the Foundation may additionally notify them in an accessible manner.

15. Contact information

15.1. For questions regarding the processing of personal data, exercising rights or withdrawing consent, you can contact the Foundation:

Data	Contacts
Stock	BO "CF "REPOWER UKRAINE FOUNDATION"
Code according to EDRPOU	45127019
Address	01001, Ukraine, Kyiv, Lyuteranska St., Building 3
E-mail	help@repowerua.org
Website	https://repowerua.org

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