

PRIVACY POLICY

“Dilijan Community Center” non-governmental organization (“DCC”, “we” or “us”) (registration number: 211.171.1132858, legal address: 7, Getapnya str., Dilijan, Tavush Region, Republic of Armenia) is committed to complying with its legal obligations under the applicable laws and to the protection of the rights and freedoms of individuals whose personal data DCC obtains or generates as part of its activities.

The data acquired by DCC is subject to processing by “Shkoli Mira” Charity Foundation (registration number: , address:) (hereinafter – “the Authorized person”).

DCC guarantees that personal data will be processed in countries that ensure an adequate level of personal data protection as published by the Personal Data Protection Authority of the Republic of Armenia.

The Authorized person processes information and data held about you and provided by you in the following ways:

- To provide you with information and support that you request from DCC or expect within the scope of cooperation between DCC and you.
- To provide you with newsletters, information about DCC upcoming events and projects that DCC feels may interest you.
- To allow you to participate in DCC events, discussions and supporting activities when you choose to do so.
- To use your personal data, including photos or videos with your participation in various media channels, including social media.
- To prepare and generate statistics and other reports.
- To examine your requests and ensure immediate connection with you.
- To disclose or share your personal data if DCC is under a duty to do so in order to comply with any legal obligation.
- To process the data in the context of your donation through the website.
- To involve you as a volunteer in DCC programs or to consider such requests.

The Authorized person shall not process your personal data for the purposes other than listed above or prescribed by the applicable law of the Republic of Armenia.

For the purposes of identification of your preferences, personalization and improving the Website usability “cookie” files are used. If you do not wish to use “cookie” files, you shall change the Web browser settings. You shall be aware that disabling cookie may lead to inability to access the Website.

The date of giving consent to the processing of your personal data is the date of submitting your personal data through the website.

We implement or ensure implementation of appropriate technical and organizational measures to protect the information we collect and store from unlawful or accidental access to it, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions in relation to personal data.

Whilst the Authorized person uses its best efforts to ensure the security of your personal data, please be aware that the security of information transmitted over the Internet cannot be

guaranteed. Accordingly, any transfer of personal data over the Internet, including during submission of such information to the Website, is done at your own risk.

The user acknowledges that the Authorized person may use automated data processing. However, the Authorized person ensures that such processing will not be used to make legally binding decisions affecting the user.

Rights of a Data Subject

As a data subject you have certain rights which you may exercise if the Authorized person is in possession of, or is processing, your personal data. Specifically:

- **Right of access** – you have the right to request a copy of the information that was provided.
- **Right of rectification** – you have a right to correct data about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right, in certain circumstances, to ask for the data about you to be erased from the records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data about you transferred to another organization.
- **Right to object** – you have the right to object to certain types of processing or to ask to stop or to restrict the processing of your personal data.

To exercise these rights please contact DCC using the contact details set out in the Contact Information section below. DCC may, in accordance with the current legislation of the Republic of Armenia, refuse to provide, correct, block or destroy personal data, by presenting to the applicant, in accordance with the procedure prescribed by law, the reasons for refusing such provision, correction, block or destruction, which served as the basis for making a decision. You have the right to complain as outlined in the Complaints section below.

If you would like to receive further information concerning the processing of your personal data or to ask us to correct, update or delete any personal data relating to you, you may contact DCC with a request to do so at DCC contact.us@dcc.am. At the same time, to protect your privacy and security, please be aware that DCC may take reasonable steps to verify your identity before taking any steps based on your request (e.g., by asking you to indicate the e-mail address that you have previously submitted to the Website).

Basis of Processing Personal Data

The Authorized person will only process personal data where the Authorized person has a lawful basis on which to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which it is used by the Authorized person but will be one or more of following:

- **Consent:** you have provided your consent (including tacit consent) to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with DCC or because you have asked DCC to take specific steps before entering into a contract.

- **Legal obligation:** the processing is necessary for us to comply with DCC's legal obligations.
- **Vital interests:** the processing is necessary to protect someone's life.
- **Legitimate interests:** the processing is necessary for DCC's legitimate interests or the legitimate interests of a third party.

For these purposes the Authorized person may collect your personal data including first name, last name, date of birth, nationality, country of residence, email addresses, contacts, data which are automatically submitted by using the Website pages (including, IP-address, source of the Website visits and information of search or advertising request, data on the user device, the user clicks, hits on the elements of the Website pages, page views, data on the banners and videos views, data characterizing the audience segments, parameters of a session, information on time and duration of a visit, the user identifiers stored in "cookie" files).

Term for Holding Personal Data

The Authorized person will only retain your personal data for the period necessary to fulfil the purposes for which it is collected and processed, or for such shorter or longer period as may be prescribed by applicable law. After such time, we will either delete or anonymize your personal data or, if this is not possible, we will securely store your personal data and isolate it from any further use until deletion is possible.

You may withdraw your consent on processing your personal data by email using Contact Information stated below. Once DCC has received your notification that you have withdrawn consent, DCC will delete your personal data in the databases hosted internally and (or) externally.

Security and Responsibility

DCC and/or the Authorized person is not responsible for loss or disclosure of personal data if such data:

- appears in public domain before being lost or disclosed;
- was independently processed by the third parties;
- was obtained by the third parties by means of unauthorized access to the Website files;
- was disclosed with your consent.

You are responsible for lawfulness, correctness and truthfulness of the submitted personal data in accordance with the applicable legislation.

Contact Information

In case of any questions or requests, please contact us at contact.us@dcc.am.

Complaints

If you wish to make a complaint about how your personal data is being processed or how your request has been handled, you have the right to lodge a complaint by contacting: contact.us@dcc.am.

Changes to this Policy

DCC may update or amend this Policy from time to time to comply with law or to meet its changing internal policies without notice to you. Any updates will be posted, and the date of recent revisions will appear on the Website, so please check this page occasionally to see if you are happy with the current edition of the Policy.

Final Provisions

This Policy applies to this Website only. DCC and/or the Authorized person does not control and is not responsible for the third parties' websites that you may switch to via the links available on this Website.