



## STCU Privacy Policy

Date: August 2020

*STCU is an intergovernmental organisation funded by the European Union, Ukraine, and the United States governments and headquartered in Kyiv with the aim to advance global peace and prosperity through cooperative Chemical, Biological, Radiological, and Nuclear (CBRN) risk mitigation by supporting civilian science and technology partnerships and collaboration that address global security threats and advance non-proliferation.*

Science and Technology Center in Ukraine (STCU) as controllers of personal data is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, STCU is committed to the appropriate protection and use of “personal data” that has been collected. Personal data is any information which can be used directly or indirectly to identify a person.

Generally, our intent is to collect only the personal data that is provided voluntarily by individuals who are participating in STCU actions so that we can contact those individuals and they can participate in the specific actions or offer information about employment opportunities. Please review this privacy policy (“Privacy Policy”) to learn more about how we collect, use, share and protect the personal information that we have obtained.

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### 1. Collection and use of personal information

#### 1.1. What information we collect

We obtain personal information about you if you choose to provide it - for example, to contact mailboxes or to register for certain activities. In some cases, you will have previously provided your personal information to STCU (if, for example, you are a former employee).

If you choose to register or login to the STCU web site, we will collect any information or content needed for the registration or log-in that you have permitted, such as your name and email address.

When you submit personal information to STCU we will use this information in the manner outlined in this privacy policy. Your personal information is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law.

If you send us a resume or curriculum vitae (CV) to apply online or in printed copy for a position with STCU, we will use the information that you provide to match you with available STCU job opportunities.

#### 1.2 The legal grounds we have to use your personal information

STCU generally collects only the personal information necessary to fulfil your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

The law allows us to process personal information, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- **Performance of a contract:** this is when the processing of your personal information is necessary in order to perform our obligations under a contract;
- **Legal obligation:** this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- **Legitimate interests:** we will process information about you where it is in our legitimate interest in implementing STCU's activities to do so in order to further those aims, so long as it doesn't outweigh your interests; or
- **Your consent:** in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting STCU at [gdpr@stcu.int](mailto:gdpr@stcu.int).

Examples of the 'legitimate interests' referred to above are:

- To offer information and/or services to individuals who visit our website or offer information about employment opportunities.
- To prevent fraud or criminal activity and to safeguard our IT systems.
- To customize individual's online experience and improve the performance usability and effectiveness of the STCU website.

- To meet our corporate and social responsibility obligations.

*STCU only collects personal data to perform STCU's actions we do not collect special categories of data, such as diversity related information (including data about racial and ethnic origin, political opinions, religious beliefs and other beliefs of a similar nature, trade union membership and data about sexual life and sexual orientation), or health data and data about alleged or proven criminal offences.*

### **1.3 Automatic collection of personal information**

In some instances, STCU and its service providers use cookies, web beacons, and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability and effectiveness of STCU's online presence.

#### **1.3.1 IP addresses**

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct web site trend and performance analysis.

#### **1.3.2 Cookies**

Cookies will typically be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On our web site, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our web site's features.

Further information about managing cookies can be found in your browser's help file or through sites such as [www.allaboutcookies.org](http://www.allaboutcookies.org).

Below is a list of the types of cookies used on our web site:

Purpose	Description	Type & expiry
Performance (i.e. User's Browser)	Our web sites are built using common internet platforms. These have built-in cookies which help compatibility issues (e.g. to identify your browser type) and improve performance (e.g. quicker loading of content).	Session Deleted upon closing the browser
Security (e.g. Asp.NET) Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session Deleted upon closing the browser
Site Preferences	Our cookies may also remember your site preferences (e.g., language) or seek to enhance your experience (e.g., by personalizing a greeting or content). This will apply to areas where you have registered specifically for access or create an account.	Session Deleted upon closing the browser

Other third-party tools and widgets may be used on our individual web pages to provide additional functionality. Use of these tools or widgets may place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.

**By navigating on our web sites or entering your login details to access areas reserved for registered users, you agree that we can place these cookies on your computer or internet enabled device.**

### 1.3.3 Location-based tools

STCU may collect and use the geographical location of your computer or mobile device. This location data based on your request is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

### 1.4 Social media widgets and applications

STCU web sites do not include functionality to enable sharing via third party social media applications, such as the Facebook like button and Twitter widget. However, STCU does maintain an STCU page on Facebook. These social media applications will collect and use information regarding your use of STCU web sites (see details on cookies above). Any personal information that you provide via such social media applications will often be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, STCU web sites may host blogs, forums, crowd-sourcing and other applications or services (collectively “social media features”). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any STCU social media feature will typically be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we often have limited or no control.

### 1.5 Children

STCU understands the importance of protecting children’s privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 13. It is our policy never to knowingly collect or maintain information about anyone under the age of 13, except as part of an engagement to provide professional services.

### 1.6 Direct marketing

STCU does not conduct direct marketing, however we may use your personal data to invite you to participate in STCU activities such as: seminars, conferences, and other STCU organised events. STCU maintains a subscription list and sends a newsletter to project participants, partners and funding parties to inform them of STCU activities these newsletters do not constitute a marketing action.

## 2. Sharing and transfer of personal data

We do not share personal data with third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards.

STCU will not transfer the personal data you provide to any third parties for their own direct marketing use.

### 3. Choices

In general, you are not required to submit any personal information to STCU, but we will require you to provide certain personal information in order for you to participate in STCU activities and events. STCU will also ask for your permission for certain uses of your personal information, and you can agree to or decline those uses.

With the exception of an occasional newsletter to project participants, partners, and funding parties STCU does not use mass communications, such as an e-newsletter, and your personal information will not be used in conjunction with such actions.

As described in 'Cookies' above, if you wish to prevent cookies from tracking you as you navigate our sites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our sites may not work properly if you elect to refuse cookies.

### 4. Your rights

If STCU processes personal information about you, you have the following rights:

- **Ask questions:** If you have questions or comments about our administration of your personal information, please contact us at e-mail [gdpr@stcu.int](mailto:gdpr@stcu.int).
- **Access and correction:** you have the right to access to that data. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. If the information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in the personal information.
- **Object to processing:** you have the right to object to us processing your personal information if we are not entitled to use it any more
- **Other rights:** in addition, you may have rights to have your information deleted if we are keeping it too long, have its processing restricted in certain circumstances and/or to obtain copies of information we hold about you in electronic form.

You can make a request or exercise these rights by contacting STCU at [gdpr@stcu.int](mailto:gdpr@stcu.int) and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

### 5. Data security and integrity

STCU has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite STCU's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We also make reasonable efforts to retain personal information only for so long

- i) as the information is necessary to comply with an individual's request,

- ii) as necessary to comply with legal, regulatory, internal business or policy requirements, or
- iii) until that person asks that the information be deleted.

The period for which data is retained will depend on the specific nature and circumstances under which the information was collected. You are entitled to request information about specific storage period regarding your data by contacting STCU at e-mail [gdpr@stcu.int](mailto:gdpr@stcu.int).

### 6. Changes to this policy

STCU may modify this Privacy Policy from time to time to reflect our current privacy practices. When we make changes to this policy, we will revise the “updated” date at the top of this page.

### 7. Policy questions and enforcement

STCU is committed to protecting the online privacy of your personal information. If you have questions or comments about our administration of your personally identifiable information, please contact us at [gdpr@stcu.int](mailto:gdpr@stcu.int). You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Policy.

We will acknowledge your email within 20 days and seek to resolve your concern within one month of receipt. Where the concern is complex or we have a large volume of concerns, we will notify you that the concern will take longer than one month to resolve, and we will seek to resolve your concern within three months of the concern being first raised. We may accept your concern (and in that case implement one of the measures set out in the ‘Your Rights’ section above), or we may reject your concern on legitimate grounds.

### Appendix

#### *Data transfers to third parties*

We do not share personal information with third parties, except as necessary for our legitimate interests - legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards. This may include:

- Our service providers: we transfer your personal information to our third party service providers, such as our (IT) systems providers, our hosting providers, our payroll providers, consultants (such as legal advisers) and other goods and services providers. STCU works with such providers so they can process your personal information on our behalf. STCU will only transfer personal information to them when they meet our strict standards on the processing of data and security. We only share personal information that allows them to provide their services.
- Courts, tribunals, law enforcement or regulatory bodies: STCU will disclose personal information in order to respond to requests of courts, tribunals, government or law enforcement agencies or where it is necessary or prudent to comply with applicable laws, court or tribunal orders or rules, or government or professional regulations.
- Audits: disclosures of personal information will also be needed for data privacy or security audits and/or to investigate or respond to a complaint or security threat.