



**UKRAINE**  
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## **DATA PROTECTION AND CONFIDENTIALITY POLICY**

<b>Document</b>	Data Protection Policy
<b>Organization</b>	Non-Governmental Organization "International Anti-Corruption Assembly" (NGO "IACA")
<b>Version</b>	7.0
<b>Approved</b>	February 25, 2026
<b>Approved by</b>	Secretary General of the Central Committee of NGO "IACA"
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## **1. General Provisions**

The Non-Governmental Organization “International Anti-Corruption Assembly” (hereinafter referred to as the Organization or NGO “IACA”) recognizes the right of every person to the protection of personal data and confidentiality of information as one of the fundamental principles of its activities.

The Organization carries out its activities in Ukraine and in 15 countries around the world, has international partners, and plans further expansion of international cooperation. This Policy establishes uniform standards for the collection, processing, storage, use, and protection of personal data.

The Policy has been developed in accordance with the Charter of the Organization, the Law of Ukraine “On Personal Data Protection”, the General Data Protection Regulation of the EU (GDPR), the United Nations Convention against Corruption (UNCAC), other international data protection standards, as well as the legislation of the countries in whose territory the Organization carries out its activities. The Policy ensures a universal approach that applies to both Ukrainian and foreign volunteers, employees, members, and partners.

## **2. Purpose of the Policy**

- Ensuring a high level of personal data protection in all countries of the Organization’s presence;
- Prevention of unauthorized access, leakage, or unlawful use of data;
- Compliance with the principles of legality, transparency, data minimization, and accountability;
- Increasing trust among members, volunteers, beneficiaries, partners, and donors;
- Harmonization of Ukrainian legislation requirements with international standards.

## **3. Scope of Application**

The Policy applies to all processes of personal data processing in the Organization, regardless of the country where they are carried out, the form (paper or electronic), and to all persons involved in data processing:

- Secretary General;
- Employees (including staff from 2026);
- Volunteers, interns, consultants;
- Members of the Organization, beneficiaries, and international partners;
- Third parties who process data on behalf of the Organization.

## **4. Core Principles of Personal Data Processing**

- Legality, fairness, and transparency;
- Purpose limitation;
- Data minimization;
- Accuracy and relevance;
- Storage limitation;
- Integrity, confidentiality, and accountability;
- Compliance with the legislation of the country where the data is processed.

## **5. Rights of Data Subjects**

Data subjects have the right to:

- Access to their data;
- Rectification, erasure, or restriction of processing;
- Withdrawal of consent;
- Objection to processing.

The Organization is obliged to consider requests within the time limits established by the legislation of the country where the data is processed (but no later than 30 days, unless otherwise provided by law).

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## 6. Data Protection Measures

- Technical and organizational security measures (access control, encryption, regular checks);
- Restriction of access to authorized persons only;
- Conclusion of data processing agreements with third parties;
- Regular training of staff and volunteers on data protection issues.

## 7. Notification of Breaches

In the event of a personal data breach or incident, the Organization conducts an investigation and notifies data subjects and relevant authorities in accordance with the requirements of Ukrainian legislation and the legislation of the country where the incident occurred.

## 8. Responsibilities

**8.1** The **Secretary General** is responsible for the overall implementation of the Policy and the appointment of a person responsible for data protection.

**8.2** All **employees, volunteers, and partners** are obliged to comply with this Policy, ensure the confidentiality of data, and report any incidents.

## 9. Related Documents

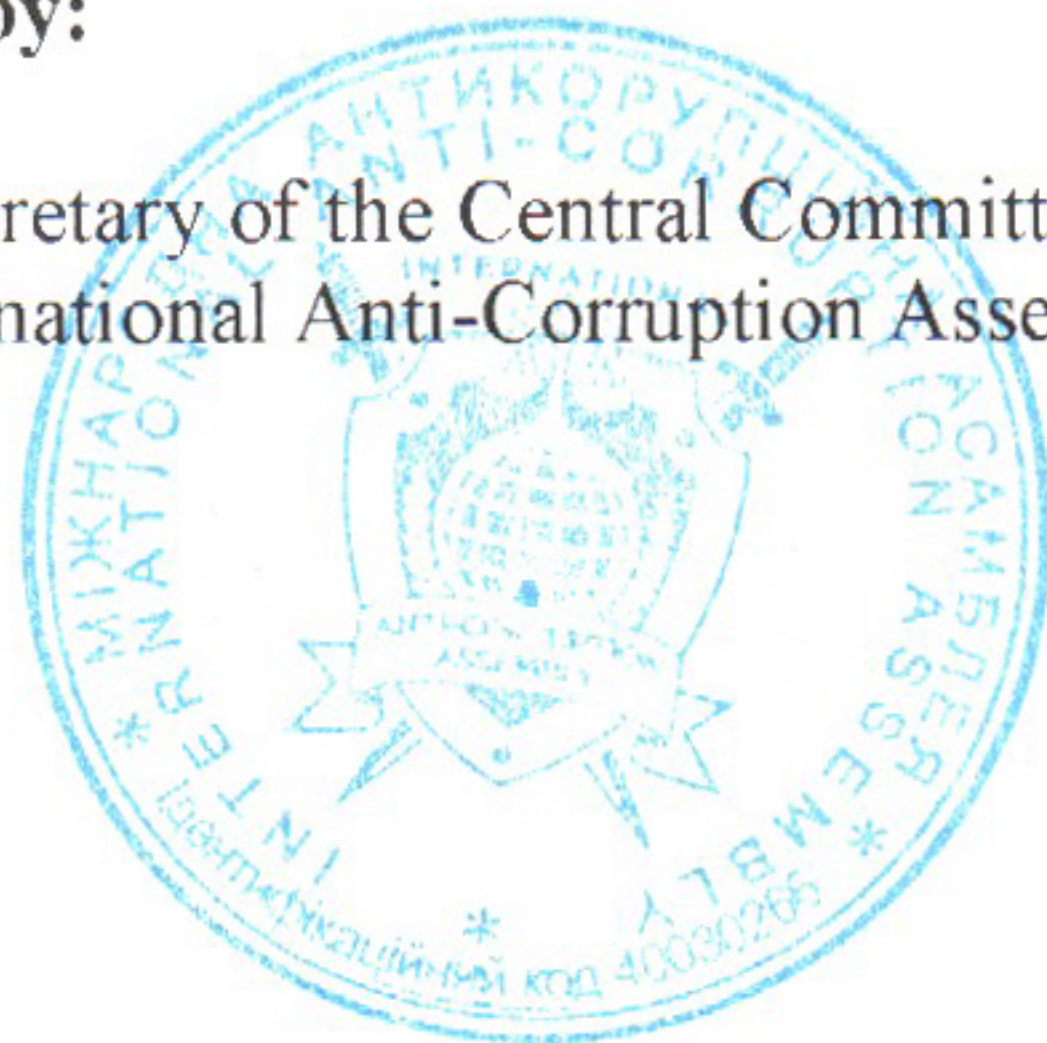
- Code of Conduct;
- Whistleblower Policy and Protection of Whistleblowers;
- Conflict of Interest Policy;
- Financial Procedures.

## 10. Final Provisions

This Policy enters into force on February 25, 2026. It is reviewed at least once every two years or in the event of changes in international legislation or the geography of the Organization's activities.

### Approved by:

General Secretary of the Central Committee  
NGO "International Anti-Corruption Assembly"



Viacheslav Sayenko