

Privacy Policy

Last updated: 09 July 2018

Welcome on <http://socialachievement.org/bg/>

Thank you for visiting our website. We, the Trust for Social Achievement Foundation ("the Foundation", "TSA", "we", "our" or "us"), respect your privacy and we are committed to protect the personal data you are providing us. In this regard, we would like to inform you about the principles that form our privacy policy.

The present updated version of our Privacy Policy is intended to comply with the requirements of the General Data Protection Regulation (GDPR), effective from 25.05.2018.

WHO ARE WE?

The Trust for Social Achievement Foundation is a non-profit organization registered in the United Republic of Bulgaria: Sofia 1000, 64 Patriarh Evtimii Bul. Our contact details for the purposes of this Policy are as follows: Ms. Kristina Boeva, email address: compliance@tsa-bulgaria.org.

WHY DO WE NEED YOU TO READ OUR PRIVACY POLICY?

Please read the following Privacy Policy carefully. It highlights a number of questions, including what personal information we collect through our website and the purposes for which we process it, as well as whom we share it with.

By using <http://socialachievement.org/bg/> (the "Website"), irrespective of whether you are just visiting it to make yourself familiar with us and our activity, use it to apply for funding, or send us a message by completing the contact form, you share information which may contain personal data.

In the course of performing some of the above actions, you may be required to provide certain personal information, such as name, address, mobile number, e-mail, etc. You are entitled to choose whether or not to provide us with your personal data. In the event you decide not to share them with us, we will not be able to process your application, contact you and/or assist you with information.

We reserve the right to amend and update this Policy from time to time. In such cases, the current version will always be available on our Website and, when necessary, you will be notified about this in due form (e.g. by email). The date of the last update will be indicated at the top of the Privacy Policy.

Please note that the practices described in this Privacy Policy apply only to information you provide us when using our Website. These terms do not apply to information you have provided on pages maintained by other organizations.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

Information you give us.

This is information that you give us by filling in forms, sending inquiries and messages on our Website, as well as when further interact with us in the course of processing your project proposals, and during the execution and reporting of the funded by TSA project. This information may include your identification data, contact details (e-mail address and phone number), financial information, etc., which may be required for further processing of your data in relation to a grant agreement ("grant/micro grant agreement").

Information we collect about you.

We use Google Analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043, USA ("Google"), which collects and process information about your actual location and other technical information about your visit on our Website. For this purpose we use "cookies" as described below in this Policy ("Cookies Policy").

The information collected by Google Analytics includes the Internet protocol (IP) address used to connect your computer or another device to the internet, click stream to, through and from our site (including date and time), page interaction information (such as scrolling, clicks, and mouse-overs). Google Analytics use various technologies to determine location, including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points and power supply. This information will be transferred to a Google server in the United States where it will be saved and analyzed. The relevant results will be provided to us in an anonymous form. In this process, the collected data will not be associated with your full IP address. We have enabled the IP anonymization function offered by Google on our website so that the last 8 bits (IPv4 type) or the last 80 bits (IPv6 type) of your IP address will be deleted. In addition, Google is a certified US Privacy Shield organization in the relations between the EU and the USA (EU-U.S. Privacy Shield) that guarantees an adequate level of data protection in the United States. You can withdraw your consent at any time by downloading and installing the suggested browser, or by managing your consent in the box of opt-out cookies. Both options prevent web analytics only if you use the browser on which you have installed this plug-in or if you do not delete the refusal cookie. For more information check Google Terms of Use and Privacy Policy. Please refer back constantly to Google website for any changes or updates to these terms and to the information collected by Google Analytics.

HOW WE COLLECT AND USE YOUR INFORMATION?

In general, you can browse the Website without submitting your personal information. However, there are circumstances in which you may be required to provide us with your personal data.

We collect your personal data in the following cases:

1. When applying for funding in order to be able to process your inquiry, to contact you, including to send you our application form;
2. When you register for and participate in our programs, activities, initiatives and events for the purpose of conducting them;
3. When you have requested to receive information or assistance by filling in our contact form to send you a personalized reply;

4. When you reply to ABF's questions in the process of processing your application for funding, for the purposes of its overall assessment, possible approval and allocation of the funds;
5. In connection with the verification of the information you provide to verify your identity and prevent violation of the Terms and Conditions of use;
6. In the course of our communication regarding projects, initiatives, events and other activities published on the Website;
7. In relation to any section of the Website where you deliberately and voluntarily provide personal information and data.

Briefly, we process your personal information and data for the following purposes:

1. Responding to your inquiries;
2. Processing your requests/applications for funding and communicating with you;
3. Sending our application form, as well as for subsequent processing of the data for the purpose of entering into, implementing and reporting of a grant/micro-grant agreement;
4. Detecting, investigating and preventing actions that may be in violation of our policies or are illegal;

WHAT IS THE BASIS FOR PROCESSING OF YOUR PERSONAL DATA?

Contractual and pre-contractual obligation (performance of a contract) - firstly, your personal data is necessary for taking steps upon your request preceding the conclusion of a grant agreement, as well as for the conclusion and implementation of such agreement.

Compliance with a legal obligation - the processing of your data is necessary for us to comply with the obligations imposed by the applicable laws, for example, for financial and accounting purposes.

Performance of a task carried out in the public interest - in many cases our projects and the related data processing activities are based on the need to perform a task in the public interest.

Your consent - we rely on your consent to proceed your personal data.

Legitimate interests - your personal data are also needed for the purposes of our legitimate interests as a funding organization providing grants, supporting the private sector in the Republic of Bulgaria, and which is governed by certain principles and values. Our activity is subject to internal and external audit. In addition, we need your personal data in order to prevent possible misuse of the allocated funds. In order to follow our overall mission and its supporting strategies, we need to promote and evaluate the results of each and every project. Given the limitations on the processing of personal data, safeguards and protection measures applied by us, the Foundation, after an analysis, has come to the conclusion that when processing your data is based on our or third party's legitimate interests, your interests, fundamental rights and freedoms are adequately and sufficiently protected. You can contact us at any time by using the contact details listed above to request more information on how we have come to this conclusion for the different types of processing.

HOW LONG DO WE RETAIN YOUR INFORMATION AND WHAT ARE THE CRITERIA?

We store your data only for the term necessary for the specific purpose for which data are collected, or for the periods prescribed by applicable laws. In case your application for funding is approved, your personal data will be retained for a period of time according to the Foundation's internal policies regarding the conclusion, implementation and reporting of a grant/micro-grant agreements.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

The Foundation is committed to apply the highest standards of ethical and legal practices in all its activities, including the protection of the personal data of all users of the Website. Except in the cases provided below, we will not disclose, nor allow any person outside the Foundation to access or use your personal information.

We may share your personal data with: (I) our funding organizations and structures, such as the America for Bulgaria Foundation, in relation to legal relationships between us and for the purpose of reporting under statutory provisions; (II) partners and service providers of the Foundation for the purposes of implementing a contract, incl. for improvement and optimization of our Website; (III) partners of the Foundation in collaborative initiatives, co-organizers of events and other activities; (IV) third parties when required by law. These data recipients are legally or contractually obliged to protect the confidentiality and security of your personal information and data. They are not authorized to use, disclose or modify this information in any way except for the purposes of performing the services assigned by TSA.

We have the right to disclose your personal data and information to the competent authorities in the cases and under the conditions set forth in the applicable laws.

HOW AND WHERE DO WE TRANSFER YOUR PERSONAL DATA?

The Foundation may transfer data to its partners, contractors, service providers established within and outside the EU which are committed by virtue of a contract with us to support TSA in its activities and in complying with the principles described in this Privacy Policy. The non-EU countries concerned may not provide the same level of protection of personal data as your country. In such cases, the Foundation will ensure that personal data are adequately protected by data recipients in these countries. Adequate protection usually means imposing on the receiving party contractual obligations that ensure that this party maintains the same high level of privacy and data protection that is maintained by the Foundation.

In the absence of appropriate safeguards, the data transfer may be carried out due to the need of implementation of pre-contractual measures taken upon your request, performance of a contract between you and TSA, as well as for the purposes of conclusion and/or performance of a contract between TSA and a third party concluded in your interest. In some cases, data transfer may be required for important reasons of public interest.

WHAT ARE YOUR RIGHTS?

Right of access and right of rectification

You have the right to receive information about what personal data of yours are being processed by the Foundation, about the data source and the purposes of their use, and about the third parties recipients of the data. You are entitled at any time to request rectification of inaccurate or incomplete data. If the request is evidently unreasonable or excessive, especially for its repetitive nature, the Foundation may refuse to take actions.

Right of data erasure (“right to be forgotten”)

You are entitled to request the erasure of your personal data in specific circumstances, e.g. (i) personal data are no longer required for the purposes for which they were collected, (ii) the consent on which data processing is based is withdrawn and there are no legal grounds for further processing, (iii) the processing is unlawful, or (iv) the erasure is required for the purposes of fulfilment of a legal obligation, applicable to the Foundation. We may disregard your request, if processing is necessary for other purposes, including public interest. The right of erasure is not absolute and your request may not be satisfied in cases where the processing of your data is necessary for ABF to comply with a legal obligation applicable to it, for the performance of a task in public interest, to establish, exercise or protect legal claims.

You can contact us at the contact details listed above to get more information about deleting your personal information.

Right to object

You have the right to object to the processing of your personal data for the performance of a task in public interest, for the legitimate interests of the Foundation, including against profiling. However, even if you object to a particular processing, we may proceed with it, if is permitted or required by the applicable laws, for example, in order to be able to meet legal requirements or fulfil our contractual obligations to you.

Right to restriction of processing

You may request the processing of personal data to be restricted if (i) you believe your personal data is inaccurate in order for us to verify its accuracy; or (ii) you consider the processing to be unlawful, but you do not want the data to be erased, or (iii) you have objected to data processing for the purposes of our legitimate interests, or (iv) you consider we no longer need your personal data, but you require them to establish, exercise or protect legal claims.

Right of consent withdrawal

If at any time you have given your consent to the processing of your personal data, you may withdraw this consent for future processing to which this consent refers.

Please note that the withdrawal of consent does not affect the lawfulness of processing of your personal data on another valid legal basis and lawfulness of the processing on the basis of the consent given before withdrawal.

Right of data portability

In certain cases, you are entitled to receive your personal data you have provided to us in a structured, commonly used and machine-readable format, and you might request that we transmit this data

directly to another data controller when technically possible. This right does not apply to the processing necessary for the performance of a task in public interest.

Right to lodge a complaint

If you consider that your personal data processing is in violation of the legal requirements, you have the right to lodge a complaint with the competent supervisory authority. Use the following link to find the competent authority in the EU Member State of your habitual residence, place of work or place of the alleged infringement:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

It is recommended that you address your claims to the Foundation first in order to get a quicker and more effective solution to the problem.

WHAT TO DO IF YOU WANT TO EXERCISE YOUR RIGHTS OR CONTACT US FOR MORE INFORMATION?

In order to exercise your rights, you may submit a request to the above listed email address.

If you would like to receive additional information or have any complaints about the way we use your personal information, you can use our contact details listed above.

Cookies Policy

The Foundation uses cookies (including in the services provided by Google Analytics as described in the "Information we collect about you" section above) to obtain certain user information on how and when certain sections of our Website are viewed and the number of people that have visited them. You can set your browser to refuse, remove or block cookies or indicate to you when a cookie is generated without affecting the use of most features on the Website. For more information about cookies, please visit: www.allaboutcookies.org.