



## PRIVACY POLICY

Last updated: 21 June 2019.

The Adonyeva Foundation (company number CE017308) (“**us**”, “**our**”, “**we**”, “**the Foundation**”) is the controller of your personal data collected through the Website. The Foundation is committed to protecting and respecting your privacy.

### 1. Introduction

This privacy policy (the “**Privacy Policy**”) sets out the types of personal data we collect when you access and visit [theadonyevafoundation.com](http://theadonyevafoundation.com) (the “**Website**”), and how we may manage and use that data.

For ease of reading, we have divided this Privacy Policy into several sections:

1. [Introduction](#)
2. [What information can we collect?](#)
3. [How is your personal information collected?](#)
4. [How and why do we use and share your personal information?](#)
5. [For how long do we keep your personal information?](#)
6. [Security](#)
7. [International Data Transfers](#)
8. [Your Rights](#)
9. [Contact Details](#)

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notices that we may provide on the Website at or around the time that we collect or process personal data about you so that you are fully aware of how and why we are using that data.

This Privacy Policy supplements other notices on our Website and is not intended to override or replace them.

By visiting or otherwise using our Website, you agree to its terms (including as amended from time to time) and this Privacy Policy. If, for any reason, you do not agree to the terms of this Privacy Policy, please stop using this Website.

We reserve the right to revise or amend this Privacy Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant, we will endeavour



to let users of the Website know. However, it is your responsibility to check this Privacy Policy before each use of the Website.

The Website is not intended for children and we do not knowingly collect personal data relating to children.

## **2. What information can we collect?**

### What is personal data?

Where this Privacy Policy refers to 'personal data' it is referring to data about you from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

### What types of data we collect from you when you use the Website?

The personal data we collect from you may include:

- **Identity Data:** which includes your full name.
- **Contact Data:** which includes your e-mail address.
- **Technical Data:** which includes your IP address, browser type and browser version.
- **Usage Data:** which includes information about how you use the Website.

## **3. How is your personal information collected?**

### Information you give to us

When you use the Website to complete a form, contact us by email or by post, report a problem with a Website, or offer your information to us in any way, we may collect, store and use the personal data that you disclose to us.

It is important that the personal data we hold about you is accurate and current. If you want to update the information you have previously given to us, [please contact us](#).

### Automated technologies or interactions

Each time you use our Website we will automatically collect your personal data including Technical Data and Usage Data. We collect this data using technologies such as cookies or other similar tracking technologies.



We use this data for several different reasons. Firstly, we use it to ensure that the Website works properly and that you are able to receive the full benefit of it. Second, we use the data to monitor online traffic and audience participation across the Website. We undertake both of these activities because we have a legitimate interest in doing so.

Please refer to our Cookies Policy for further details.

#### Third parties or publicly available sources

We may also receive personal data about you from various third parties, and public sources, such as: analytics providers, advertising networks and search information providers.

#### **4. How and why do we use/share your personal data?**

##### Lawful basis for processing your information

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or consented to us doing so;
- Where we need to do so in order to perform a contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Here are some examples about how we may use the information we collect about you and the lawful basis we rely on to do so.

<b>Activity</b>	<b>Examples of the types of personal data we may collect</b>	<b>Lawful basis for processing</b>
To deliver the Website to you.	Technical Data and Usage Data.	Performance of contract with you.
To administer and protect our business and this Website (including troubleshooting, data	Identity Data, Contact Data and Technical Data.	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud



analysis and system testing.)		and in the context of a business reorganisation or group restructuring exercise).  Necessary to comply with a legal obligation.
To use data analytics to improve our website.	Technical Data and Usage Data.	Necessary for our legitimate interests (to keep our website updated and relevant and to develop our business)

### Sharing your personal data

Depending on how and why you provide us with your personal data we may share it in the following ways:

- we may share your personal data with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- with selected third parties who we sub-contract to provide various services and/or aspects of the Website’s functionality, such as where third-party plugins provide functionality such as message boards or image hosting services (see “[Service Providers](#)” below); and
- with analytics and search engine providers that assist us in the improvement and optimisation of this Website as described above.

We may also disclose your personal data to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets as part of that sale;
- if Adonyeva or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or



- in order to enforce or apply our Website's terms of use or terms and conditions; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject. The following is a list of the type of trusted service providers we use:

- Website Developers
- Analytics Providers

### Links to third party sites

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the Privacy Policy of every website you visit.

## **5. For how long do we keep your personal data?**

We will hold your personal information on our systems only for as long as required to provide you with the services you have requested, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your data: see [‘Your Rights’](#) below for further information.



In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **6. Security**

Adonyeva takes the protection of your information very seriously. We have put in place appropriate security measure to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including use of secure servers and passwords. Where we have given you a password that enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. International Data Transfers**

Whenever we do transfer your personal data outside of the European Economic Area (“**EEA**”), we ensure that a similar degree of protection is afforded to it by ensuring that in most cases at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- we will only transfer data to the US, where the business we are transferring your personal data to is part of the Privacy Shield (which requires them to provide similar protection to personal data shared between Europe and the US); and
- where you we use certain service providers, we will use specific contracts approved by the European Commission which gives personal data the same protection it has in Europe.



By submitting your personal data, you agree to the terms of such transfers. If you would like more information about how the mechanism via which your personal data is transferred, please [contact us](#).

## 8. Your Rights

As a data subject you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

### Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a "**subject access request**").

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

### Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the "**right to be forgotten**").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.



You can exercise this right at any time by contacting us and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

### Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Privacy Policy which explains how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

### Your Right to Portability

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party, we are happy to consider such requests.

### Your Right to object to processing





You may object to processing of your personal data where we rely on legitimate interest for processing that personal data. We will comply with your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

#### Your Right to stop receiving marketing communications

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by contacting us and telling us which communications you would like us to stop sending you.

#### Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

#### Exercising your rights

When you write to us making a request to exercise your rights, we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information, then we may delay actioning your request until you have provided us with additional information (and where this is the case, we will tell you).

### **9. Contact Details**

If you have any queries regarding this Privacy Policy, if you wish to exercise any of your rights set out above or if you think that the Privacy Policy has not been followed, please contact us by emailing at [contact@adonyevafoundation.com](mailto:contact@adonyevafoundation.com).

You may also lodge a complaint with our lead supervisory authority, the Information Commissioner, or your local supervisory authority about any aspect of our handling or processing of your personal data. We would, however, appreciate the chance to



address your concerns before you approach any supervisory authority, so please contact us in the first instance.