

## INTRODUCTION

Welcome to [www.bogartfoundation.ro](http://www.bogartfoundation.ro).

At [www.bogartfoundation.ro](http://www.bogartfoundation.ro), protecting the privacy and personal information of our users is of utmost importance. This Privacy Policy describes how we collect, use, protect, and share your personal information when you visit and use our website and associated services. Our goal is to ensure that your personal data is handled in a secure and responsible manner, in compliance with applicable regulations.

In this policy, you will find detailed information about the types of data we collect, the purposes for which we use it, your rights concerning your personal data, and the measures we take to ensure its protection.

Please read this policy carefully to understand our privacy practices. If you have any questions or concerns, do not hesitate to contact us using the contact information provided.

This policy applies to all visitors to our website, donors, volunteers, and any other individuals who provide us with personal information. By using our website, you agree to the collection and use of your personal information as described in this policy.

## GENERAL INFORMATION

FUNDATIA BOG'ART, located in Bucharest, Ion Brezoianu St. No. 27, 6th floor, Sector 1, Tax Identification Code 22613715, as the author, owner, and administrator of the website [www.bogartfoundation.ro](http://www.bogartfoundation.ro) and as the “operator” under the provisions of national legislation and the General Data Protection Regulation (Regulation No. 679 enacted by the European Parliament and the Council of the European Union concerning the protection of individuals with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC) (GDPR), effective from May 25, 2018, respects the right to privacy of individuals accessing the website and ensures the correct protection of the processing of Personal Data for visitors and users.

- Visitors – individuals accessing the [www.bogartfoundation.ro](http://www.bogartfoundation.ro) page anonymously.
- Users – individuals who use the site and complete the “contact form.”

Although you can access the content of the website without providing any personal information that might fall under the category of personal data (visitor), if you provide this information, our company may use it subsequently for the purposes stated in this document.

Your personal data will be processed exclusively based on express and unequivocal consent for such processing. Therefore, providing the requested data and information through the [www.bogartfoundation.ro](http://www.bogartfoundation.ro) site is considered to represent your express consent for your personal data to be used by [www.bogartfoundation.ro](http://www.bogartfoundation.ro), in accordance with the purposes outlined below.

We explicitly warn visitors and users that all personal data processing refers exclusively to individuals who are 16 years of age or older. Use of the site by individuals under the age of 16 is prohibited. If such a situation occurs, resulting in the processing of personal data of individuals under 16 years old, we will cease processing such data immediately upon discovering such a fact. Responsibility for the use of the site by minors lies exclusively with the parents.

The contact details of the Data Protection Officer are: Postal Address: Ion Brezoianu St. No. 27, 6th floor, Sector 1, CP010131 Email: [gdp@bogartfoundation.ro](mailto:gdp@bogartfoundation.ro)

## HOW WE COLLECT YOUR PERSONAL DATA

As a general rule, in your capacity as a visitor to our website, we collect your personal data (any information relating to an identified or identifiable individual) directly from you when you visit our website [www.bogartfoundation.ro](http://www.bogartfoundation.ro) ("Website") and/or complete the contact form available on the Website, as well as when you contact us on our Facebook, Instagram, or LinkedIn pages. The Website contains links to our Facebook, Instagram, and LinkedIn pages. In this case, Facebook, Instagram, and LinkedIn may process your personal data as independent controllers, in accordance with their own policies, which you can access on the websites [www.facebook.com](http://www.facebook.com), [www.instagram.com](http://www.instagram.com), and [www.linkedin.com](http://www.linkedin.com), respectively.

## PURPOSES OF PROCESSING AND CATEGORIES OF DATA PROCESSED

Fundatia Bog'Art processes your personal data for the following purposes:

- Tracking the legitimate interests of Fundatia Bog'Art;
- Providing information about Fundatia Bog'Art's projects (e.g., newsletters, electronic messages through various channels);
- Responding to your inquiries submitted through the contact form available on the Website;
- Informing about Fundatia Bog'Art's events;
- Assisting with needs related to projects or services;
- Participating in opinion surveys about Fundatia Bog'Art's projects and services;
- Monitoring traffic on the Website through cookies when you visit the Website. The processing is limited to how you interact with the Website, to improve your experience. For more information about our cookies, please refer to our Cookie Policy.

On [www.bogartfoundation.ro](http://www.bogartfoundation.ro), the following categories of data are processed:

- Name, surname, postal address, email address, landline and/or mobile phone numbers, company data (if applicable).
- Your contact with us, such as notes or recordings of a call you made to one of our contact centers, a Customer Relations service, an email or letter sent, or other records of a contact with us.
- Access legitimacy information – we will collect passwords, hints, and similar security information used for authentication and access to accounts and services;
- Your preferences for certain products, services, and lifestyle when you tell us what they are or when we infer them based on how you access Fundatia Bog'Art's projects and services;
- Marketing preferences;
- Information obtained from other sources, such as public or private authorities, fraud prevention agencies, as well as other data providers. This includes demographic data, interest data, and online browsing behavior.
- The level of services provided to you – for example, operational problems and other events that may affect our services;
- Responses to invitations and confirmations of participation in events.
- Any other data incidentally provided by you within the message
- Unique identification number allocated to the visitor
- Date and time of accessing the Website
- Type of browser used to access the Website

The personal data we process includes identification, transactional, financial, demographic, location, or other personal data collected directly from you or from other sources when you become our partner or when you access our projects or services.

Additionally, we note that in certain cases, the personal data mentioned above may be processed for the following purposes:

- Reporting to authorities in accordance with legal obligations under Art. 6(1)(c) of the Regulation;
- Managing IT&C systems, such as ensuring maintenance and conducting security audits of our IT networks, under Art. 6(1)(f) of the Regulation, with the aim of ensuring the proper functioning of IT systems;
- Resolving disputes, under Art. 6(1)(f) of the Regulation, to achieve our legitimate interest in asserting, exercising, or defending our rights.

We emphasize that you can change your preferences regarding the cookies used on the Website by modifying your browser settings. The “help” function available in any browser will guide you in setting options. For more information on disabling cookies, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org). For more information on our cookies, please refer to our Cookie Policy.

Fundatia Bog'Art does not intentionally collect sensitive personal data for storage.

### **LEGAL BASIS FOR PROCESSING**

- The legitimate interests of Fundatia Bog'Art, such as preventing fraud, maintaining the security of our services, direct marketing, and improving our services. Whenever we rely on this legal basis for processing your data, we assess our interests to ensure that they do not override your rights. Additionally, in some cases, you have the right to object to this processing. Fundatia Bog'Art's legitimate interest includes enabling us to exercise rights provided by law in our favor, to act in court against any illegal activities or activities that harm Fundatia Bog'Art.
- Compliance with a legal requirement, such as accounting and tax requirements, subject to strict internal policies (e.g., retention periods), procedures, and your right to restrict the use of your data, which control the subject of the services to be provided;
- Additionally, to the extent you have consented, your consent. Processing personal data based on consent represents an additional purpose of processing personal data for the execution of the contract to which you are a party and does not condition the provision/performance of contractual services.
- Processing is necessary for the performance of a task carried out in the public interest.

We will collect your personal data when, for example:

- You access or use any of our projects and services;
- You register for a specific project or service;
- You subscribe to our newsletters, alerts, or other services offered by us;
- You contact us through various channels or request information regarding a product or service;
- You have given permission to other companies, such as our commercial partners or associates, as well as third-party providers or contractors, to exchange information with us about you;
- Your personal data is publicly available; or
- You are a customer/beneficiary of a commercial activity that we acquire/provide.

We also collect information from certain organizations, if applicable and as far as we have legal grounds for this. This includes fraud prevention agencies, business directories, verification/control agencies, billing calculation agencies, and contracted service providers.

### **CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

To avoid any doubt, transfer means any disclosure or provision to third parties, either by physically transmitting personal data or by granting access to data by any other means (storage

and backup are considered transfers for the purposes mentioned above). Any disclosure of your personal data will be carried out in accordance with applicable law, ensuring its protection so that your rights and freedoms are respected.

For the fulfillment of the detailed purposes above, we may disclose your personal data to:

- a) Operational service providers, such as website development, hosting, IT&C infrastructure maintenance and support, etc., with whom we collaborate to provide our services;
- b) Consultants, such as auditors, legal consultants, and other advisors, if necessary, to provide consultancy services to us;
- c) Entities providing financial services, if you make payments, donations, or other transactions;
- d) Statutory entities, such as law enforcement agencies, other authorities or regulators, or institutions designated by applicable law, which, in cases where required by law or regulations, have the right to request and obtain personal data related to your activity.

We may also provide your personal data to other parties if required by law or necessary to comply with legal obligations or protect our rights, our clients, or the public.

We may transfer your personal data outside the European Union or European Economic Area (EU/EEA) in the following circumstances:

- If the data transfer is necessary to fulfill a contract with you or to take steps requested by you before entering into a contract;
- If the transfer is necessary to conclude or execute a contract in your interest between us and another entity;
- If the transfer is authorized by applicable data protection laws;
- If you have given your consent to the transfer.

We will ensure that the data transfer is conducted securely and in accordance with applicable data protection laws. We will also require our service providers to ensure adequate protection for your personal data.

### **DURATION OF DATA PROCESSING**

We will keep your personal data for the period necessary to achieve the purposes for which it was collected and processed, in accordance with the legal and regulatory requirements. The retention period for your data will be determined based on:

- a) The purpose for which the data was collected;
- b) The applicable legal requirements and retention periods, which vary depending on the type of data and its use;
- c) The necessity to keep the data for the purposes for which it was collected, including the duration of any contracts or transactions;
- d) The resolution of any disputes or claims related to our services.

We will periodically review the data we hold to ensure that it is accurate, relevant, and up-to-date.

### **YOUR RIGHTS**

As a data subject, you have the following rights regarding your personal data:

1. **Right to access:** You have the right to request a copy of the personal data we hold about you and information about how we use it.
2. **Right to rectification:** If you believe that the personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or complete it.
3. **Right to erasure:** You have the right to request that we delete your personal data under certain circumstances, such as when it is no longer necessary for the purposes for which it was collected.

4. **Right to restriction of processing:** You have the right to request that we restrict the processing of your personal data under certain circumstances, such as when you contest the accuracy of the data or object to the processing.
5. **Right to data portability:** You have the right to request that we transfer your personal data to another organization or to you in a structured, commonly used, and machine-readable format, under certain conditions.
6. **Right to object:** You have the right to object to the processing of your personal data under certain circumstances, including for direct marketing purposes.
7. **Right to withdraw consent:** If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
8. **Right to lodge a complaint:** If you believe that we are processing your personal data unlawfully or that your rights are being infringed, you have the right to lodge a complaint with a supervisory authority.

To exercise any of these rights or if you have any questions regarding your personal data, please contact us at [gdpr@bogartfoundation.ro](mailto:gdpr@bogartfoundation.ro).

#### **SECURITY MEASURES**

We take appropriate technical and organizational measures to protect your personal data against unauthorized access, disclosure, alteration, or destruction. We implement security measures to safeguard our IT systems and data storage facilities.

#### **CHANGES TO THE PRIVACY POLICY**

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Any changes will be posted on this page, and if the changes are significant, we will provide a more prominent notice. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your personal data.

#### **CONTACT INFORMATION**

If you have any questions or concerns about this Privacy Policy or our data processing practices, please contact us at:

FUNDATIA BOG'ART

Address: Ion Brezoianu St. No. 27, 6th floor, Sector 1, CP010131

Email: [gdpr@bogartfoundation.ro](mailto:gdpr@bogartfoundation.ro)