

## Privacy Policy of the Foundation for Women and Family Planning

Hello!

If you are here, we can be certain that you value your privacy.

We perfectly understand your approach and that is why we provide you with a document that allows you to learn about the regulations for processing your personal data, as well as the use of cookies and other similar technologies, related to the functioning of the websites and social media profiles, managed by the Foundation for Women and Family Planning (hereinafter referred to as 'FEDERA Foundation') in one place. The websites we refer to are as follows:

- <https://federa.org.pl>
- <https://ponton.org.pl>
- <https://astra.org.pl>
- <https://historiekobiet.eu>
- <https://wk-rw.pl>

We process your personal data predominantly for the purposes related to your use of our websites or social media profiles, and in particular: contact with the FEDERA Foundation, providing assistance in matters with which you reach out to the FEDERA Foundation, fulfilling legal obligations, carrying out popularization and educational activities, etc.

We process your personal data for the period necessary to accomplish a particular purpose.

You have the right to access your personal data, correct it, delete it, or limit its processing, object to the processing, as well as to transfer your data. In addition, you can lodge a complaint with the President of the Office for Personal Data Protection.

You will find the detailed information on the regulations for processing your personal data further in the Privacy Policy, and if you are looking for information about our use of cookie technology, please see our separate document – [Cookies Policy](#).

Should you have any questions related to the Privacy Policy, please do not hesitate to get in touch with us at any time by sending a message to: [kontakt@federa.org.pl](mailto:kontakt@federa.org.pl).

### Table of contents

<b># 1: Who is the Administrator of your personal data?</b> .....	2
<b># 2: Which websites does the following Privacy Policy apply to?</b> .....	2
<b># 3: Who shall you contact in connection with the processing of your personal data?</b> .....	2
<b># 4: What are the purposes of processing your personal data by us?</b> .....	3
<b># 5: What information about you do we have?</b> .....	8
<b># 6: What is 'Anonymous Information'?</b> .....	8
<b># 7: Where do we get the information about you from?</b> .....	9
<b># 8: Is your data safe?</b> .....	9

<b># 9: How long will we store your personal data?</b> .....	<b>10</b>
<b># 10: Who are the recipients of your personal data?</b> .....	<b>10</b>
<b># 11: Do we transfer data to third countries or international organizations?</b> .....	<b>11</b>
<b># 12: Do we use profiling?</b> .....	<b>11</b>
<b># 13: What are your rights?</b> .....	<b>12</b>
<b># 14: Do we use cookies or other similar technologies and what does it involve?</b> .....	<b>12</b>
<b># 15: How can you manage your privacy?</b> .....	<b>12</b>
<b># 16: Is there anything else you need to know?</b> .....	<b>13</b>
<b># 17: Can this Privacy Policy be modified?</b> .....	<b>13</b>

## **#1: Who is the Administrator of your personal data?**

The Administrator of your personal data is the **Foundation for Women and Family Planning** with its office registered at 13/15 Nowolipie Street, 00-150 Warsaw, entered into the National Court Register by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Division of the National Court Register, entry number: KRS 0000919580. Wherever the terms such as 'we' or 'our' are used in the Privacy Policy, they shall be understood as the indicated entity.

In terms of the social media platforms related to our websites, in accordance with the case law of the Court of Justice of the European Union, we are a joint Administrator of personal data together with the provider of the social network in which the profile operates.

For details on the processing of personal data by the particular social media providers, whose service we use, please check:

- [Facebook](#),
- [Instagram](#),
- [LinkedIn](#),
- [TikTok](#),
- [YouTube](#),
- [Twitter](#).

## **# 2: Which websites does the following Privacy Policy apply to?**

As part of our activity, we manage a number of websites. There is one personal data Administrator (FEDERA Foundation) who is responsible for running them, and therefore, for the sake of greater clarity and transparency, we decided to introduce a unified Privacy Policy for all our websites.

Accordingly, this Privacy Policy refers to and covers the following websites:

- <https://federa.org.pl>
- <https://ponton.org.pl>
- <https://astra.org.pl>
- <https://historiekobiet.eu>
- <https://wk-rw.pl>

### # 3: Who shall you contact in connection with the processing of your personal data?

In matters related to the protection of personal data and broadly understood privacy, you can contact us at the e-mail address: [kontakt@federa.org.pl](mailto:kontakt@federa.org.pl). In the case of social media, additionally, you can contact directly the Administrators of the social media platforms, in which you have your profiles.

### # 4: What are the purposes of processing your personal data by us?

There is more than one such goal. Please find the list of them below, along with a more detailed description. The particular purposes have also been complemented by the respective legal basis for processing data in the mentioned areas:

Purpose of processing	Description of the purpose of processing	Legal basis
<p><b>Activities related to assistance and counselling (medical and psychological support)</b></p>	<p>Our statutory goals include, among others, providing support to those who need such support and conducting broadly understood counseling. For example, we launched a helpline — at the indicated telephone number, our specialists in various fields are on duty to provide medical, psychological, and sex education counseling to the calling people. Advice can also be provided through a dedicated e-mail.</p> <p>We do our best to provide maximum discretion and privacy while providing these types of support or assistance, however, it may happen that you decide to inform us about your personal data so that we can provide you with the assistance you expect. In such cases, we most often process personal data such as name and surname, contact details, and address of residence. The processing of your personal data is based on your consent and this consent is voluntary — if you decide against it, you do not have to disclose your personal data.</p> <p>We may process some of your personal data on the basis of our legitimate interest, that is to ensure the efficient and effective implementation of our activities.</p> <p>Taking into consideration that the scope of our activities includes providing support for people affected, for example, by violations of reproductive rights, regardless of the reason, it may happen that we collect specific data related to your person (i.e. data associated with your health or sexual orientation). The legal basis for the processing of such personal data may be either your voluntary consent or the processing within the legitimate activities carried out by the Foundation.</p>	<p>Article 6(1) (a) GDPR, Article 6(1) (f) GDPR, Article 9(2) (a) GDPR, Article 9(2) (d) GDPR</p>
<p><b>Legal assistance and representation before competent authorities or courts</b></p>	<p>As part of the activities carried out by the Foundation, it is possible to ask for legal assistance, which consists of both legal consultations (e.g. to determine your legal situation) and representation before the competent courts or authorities by a professional attorney.</p> <p>If you want to use this form of support, we may process your personal data, such as your name and surname, PESEL number, address of residence, contact details (phone number, e-mail address), as well as your personal data related to the case you come to us with, i.e. your health data that has been included in your medical records. Providing us with some of the abovementioned data is voluntary, but some of them may be necessary for us to be able to help you — for example, to effectively grant the power of attorney to represent you and to work on your case. The legal basis for the processing of such personal data may be either your voluntary consent or the processing within the legitimate activities carried out by the Foundation. In addition, the execution of a contract related to representing you in a specific proceeding may constitute such basis.</p>	<p>Article 6(1) (a) GDPR, Article 6(1) (b) GDPR, Article 9(2) (a) GDPR, Article 9(2) (d) GDPR</p>

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

<p><b>Organization of training courses, events, meetings, workshops, etc.</b></p>	<p>Due to our non-governmental activity, we can undertake various initiatives, such as the organization of training courses, events, meetings, workshops, etc. In such cases, we may process your personal data necessary for you to be able to take part in a particular event. For instance, if we organize a training course, we may ask you to provide us with information such as your name, surname, and contact details — in order to include you on the list of participants. If you intend to organize a training course, workshop, or other type of event with us, we may also ask you to provide us with the data necessary to organize this event, for example, names and surnames of participants, their age, and address of the facility, etc.</p> <p>The detailed scope of personal data depends on the type of initiative and what personal data we need to enable you or individuals indicated by you to take part in the initiative or event.</p> <p>If the events are streamed online, recorded, or photographed as part of photo documentation, we can additionally process your image and voice.</p> <p>We may process some of your personal data on the basis of our legitimate interest, that is to ensure the efficient and effective implementation of our activities.</p> <p>Taking into consideration that the scope of our activities includes providing support for people affected, for example, by violations of reproductive rights, regardless of the reason, it may happen that we collect specific data related to your person (i.e. data associated with your health or sexual orientation). The legal basis for the processing of such personal data may be either your voluntary consent or the processing within the legitimate activities carried out by the Foundation.</p>	<p>Article 6(1) (b) GDPR, Article 6(1) (f) GDPR, Article 9(2) (a) GDPR, Article 9(2) (d) GDPR</p>
<p><b>Research, advisory, and expert activities</b></p>	<p>Apart from various forms of dedicated assistance, we also develop and support research, as well as advisory and expert activities that allow us to raise social awareness, develop academic records, and share expert knowledge with entities that need this knowledge.</p> <p>As part of our research, advisory, and expert activities, we collaborate with various specialists, journalists, institutions, etc. For this reason, we most often process personal data such as name and surname, name of institution, address of institution, contact details, functions, positions, scientific achievements, social achievements, education, employment, and others. This is particularly associated with the situations when we respond to an external demand for our expertise.</p> <p>We process the collected data and information primarily in order to conclude a relevant contract (e.g. related to collaboration), as well as to fulfill legal obligations imposed on non-governmental organizations when they carry out their statutory activities.</p> <p>We may process some of your personal data on the basis of our legitimate interest that is to ensure the efficient and effective implementation of our activities.</p>	<p>Article 6(1) (b) GDPR, Article 6(1) (c) GDPR, in connection with the relevant provisions of law, Article 6(1) (f) GDPR</p>
<p><b>Publication of stories of violations of reproductive rights</b></p>	<p>As part of our statutory activities, we deal with, among other things, publicizing cases where fundamental rights related to human reproductive health are violated. Therefore, we may publish descriptions of cases where such violations have occurred on a dedicated website <a href="http://historiekobiet.eu">historiekobiet.eu</a>.</p> <p>In order to share your story with us, you have to provide us with at least such personal information as your email address. You can voluntarily provide us with all the other data but we do not require it, and therefore, it is not obligatory. If you want, you can provide us with data related to your health and sexuality.</p>	<p>Article 6(1) (a) GDPR, Article 6(1) (f) GDPR, Article 9(2) (a) GDPR, Article 9(2) (d) GDPR</p>

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

	<p>The legal basis for the processing of such personal data may be either your voluntary consent or the processing within the legitimate activities carried out by the Foundation. In addition, we may process personal data on the basis of our legitimate interest, that is to reach new groups of recipients, increase the Foundation's recognition, and reach new target groups.</p> <p>We may also inform the public about the violation of your patient and reproductive rights (in particular by informing the national media, but also by posting such information on our social media profiles and websites) when we provide you with professional legal support (legal representation by an attorney collaborating with us). The basis for informing the public about the case is your consent. In such cases, unless you explicitly consent to it, we will not publish your personal data.</p>	
<p><b>Financial and material support for the Foundation (donations, fundraising, other forms of transferring funds to the Foundation)</b></p>	<p>Due to the fact that we are a non-governmental organization, we can obtain material or financial support from various sources; this includes, among others, accepting donations, organizing crowdfunding events, or other actions that are aimed at raising funds for the Foundation's activities.</p> <p>When obtaining funds and material resources, we most often process such personal data as name and surname, address of residence, address of company, bank account number, and bank name. The final scope of personal data processed may vary depending on the form of support, that is on how exactly you decide to support our activities.</p> <p>For the purpose of collecting funds, we can also use external IT systems (e.g. used to organize and carry out crowdfunding activities), and therefore, the providers of such solutions may ask you to provide them with certain data and process it, for instance, for the purposes such as counteracting fraud on their website. All the detailed information related to such solutions can be found in the Privacy Policy of particular IT systems providers.</p> <p>We process the collected data primarily in order to conclude a specific contract (e.g. a donation), as well as to comply with legal obligations imposed on non-governmental organizations raising funds for their activities.</p> <p>We may process some of your personal data on the basis of our legitimate interest, that is to ensure the efficient and effective implementation of our activities.</p> <p>Taking into consideration that the scope of our activities includes providing support for people affected, for example, by violations of reproductive rights, regardless of the reason, it may happen that we collect specific data related to your person (i.e. data associated with your health or sexual orientation). The legal basis for the processing of such personal data may be either your voluntary consent or the processing within the legitimate activities carried out by the Foundation.</p>	<p>Article 6(1)(c) of the GDPR in connection with the applicable provisions of law, Article 6(1)(b) GDPR, Article 6(1)(f) GDPR, Article 9(2)(a) GDPR, Article 9(2)(d) GDPR</p>
<p><b>Sending bulletins and newsletters</b></p>	<p>When subscribing to the bulletin/newsletter, you must provide the data necessary to receive it – as specified in the subscription form.</p> <p>Providing this data is a condition for receiving the bulletin/newsletter. In addition, the mailing system saves your IP address – the one that you used when subscribing to the bulletin/newsletter. It also identifies your approximate location and the email you use for sending and receiving messages. It also tracks your actions undertaken in relation to emails that are sent to you. Therefore, we also have information about which messages you have opened, within which messages you clicked on links, etc.</p>	<p>Article 6(1) (b) GDPR, Article 6(1) (f) GDPR</p>

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

	<p>On the basis of various criteria related to your activity, interests or other preferences, the mailing system allows us to define specific groups or segments of bulletin/newsletter recipients, and this may have an impact on what kind of messages you receive as part of the newsletter.</p> <p>The data you provide in connection with subscribing to the bulletin/newsletter is used to send you the aforementioned bulletin/newsletter, and the legal basis for its processing is the execution of the contract for the delivery of electronic services, as well as our legitimate interest – in this case, the implementation of marketing objectives.</p> <p>Regarding the processing of information that does not come from you and has been collected automatically, the basis is our legitimate interest to analyze the behavior of newsletter subscribers in order to optimize our marketing activities.</p> <p>You can unsubscribe from the bulletin/newsletter at any time by clicking on the dedicated link in each newsletter message, or simply by contacting us.</p> <p>Unsubscribing from the newsletter does not result in the deletion of your data from the mailing system. The data is then stored in the archive for the purposes of possible determination, pursuing or defending claims related to the bulletin/newsletter, as well as to ensure the possibility for us to demonstrate that the activities were carried out in accordance with the law.</p>	
<p><b>Contact and keeping a correspondence register (receiving correspondence and replying to it)</b></p>	<p>By contacting us via the available means of communication, i.e. e-mail or social media messengers, you naturally share your personal data contained in the content of the correspondence. Providing your data is the condition for establishing contact. In addition, the communication system saves the IP number that you used to send the message.</p> <p>The data is processed for the purpose of communication, which constitutes our legitimate interest. After the communication has stopped, the data is transferred to the archive for the purposes of possible determination, pursuing or defending claims related to the communication.</p>	<p>Article 6(1) (f) GDPR</p>
<p><b>Fulfillment of tax and accounting obligations</b></p>	<p>Due to the execution of various contracts, we also fulfill various tax and accounting obligations, in particular in the form of issuing invoices, including invoices in our accounting documentation, storing documentation, etc.</p> <p>In order to issue an invoice, we process, among others, data such as name and surname, company name, company address, tax identification number.</p> <p>Providing the data required by tax law is necessary to fulfill the abovementioned obligations.</p>	<p>Article 6(1) (c) GDPR in connection with the relevant provisions of tax law</p>
<p><b>Creating an archive</b></p>	<p>For the purposes of our activity, we may create archives: both traditional and digital. The archives gather personal data that we have processed in connection with you, and their scope may vary depending on what data we have received and what scope of data is justified in terms of archival activities.</p> <p>In this case, we rely on our legally justified interest which is based on structuring and organizing personal data carriers.</p>	<p>Article 6(1) (f) GDPR, Article 9(2) (d)GDPR, Article 9(2) (f) GDPR.</p>
<p><b>Defending, establishing or pursuing legal claims</b></p>	<p>Using our website, concluding a contract, or establishing collaboration with us, etc., may lead to certain claims on our or your part in the future. For this reason, we have the right to process your personal data for the purpose of defending, establishing or pursuing legal claims. Within this purpose, we may process any personal data that is related to a specific claim, and therefore their scope may vary depending on what the claim. In this case, we base on our legitimate interest, in this respect – to protect our interests.</p>	<p>Article 6(1) (f) GDPR, Article 9(2) (d) GDPR, Article 9(2) (f) GDPR.</p>

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

<p><b>Running social media profiles</b></p>	<p>If you follow our profiles on social media platforms or interact with the content we publish on social media, we naturally see the scope of your data which is publicly available on your social media profile. We process this data only within this specific social media platform and only for the purpose of operating this specific social media, which constitutes our legitimate interest.</p> <p>If you contact us via a private message, you naturally provide us with your personal data which is included in the content of the correspondence, in particular your image, name and surname. In this case, your data is processed for the purpose of contacting you, and the basis for the processing of this data constitutes our legitimate interest.</p> <p>It may happen that we will be the party initiating contact with you via social media, i.e. in order to offer collaboration; then we will process your data for the purposes of searching for potential contractors, as well as offering and establishing collaboration, which constitutes our legitimate interest.</p> <p>Messages sent to us via social media are automatically archived by the tools available within the particular social media platforms and remain available to us until you delete them. You can view all the messages exchanged with us in the private messages tab. Your use of social media platforms is subject to the Terms and Conditions and Privacy Policies of the administrators of these platforms, and these administrators deliver electronic services to you fully separately and independently of us.</p>	<p>Article 6(1) (f) GDPR</p>
<p><b>Analysis and statistics</b></p>	<p>We carry out analytical and statistical activities with the use of tools provided by external providers. Within such analytical tools, we only have access to Anonymous Information. The processing of this information is based on our legitimate interest, which is creating, examining, and analyzing statistics related to the activity of users on our website in order to draw conclusions allowing us to optimize our activities in the future.</p> <p>From the level of tools, we only have access to a set of statistics and information not assigned to specific people.</p> <p>Detailed information on the tools provided by external providers can be found in the section dedicated to the tools we use.</p>	<p>Article 6(1) (f) GDPR</p>
<p><b>Marketing activities</b></p>	<p>We conduct marketing activities with the use of tools provided by external providers. Within such marketing tools, we only have access to Anonymous Information. The processing of this information is based on our legitimate interest, which is carrying out marketing activities, including targeting advertisements within external systems for the purposes of our marketing activity. From the level of tools, we only have access to a set of statistics and information not assigned to specific people.</p> <p>Detailed information on the tools provided by external providers can be found in the section dedicated to the tools we use.</p>	<p>Article 6(1) (f) GDPR</p>
<p><b>Providing additional functionalities with the use of Anonymous Information only</b></p>	<p>On our websites, we can embed video or audio players, social widgets, comments modules, or other tools that are provided by external providers. All of these tools process Anonymous Information. The processing of Anonymous Information is based on our legitimate interest which in this particular case constitutes providing our website users with the possibility of using additional functions on the website. From the level of tools, we do not have access to any other information as this information is irrelevant in the context of our activity – Anonymous Information is processed solely for the additional functions to be able to work.</p>	<p>Article 6(1) (f) GDPR</p>

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

	Detailed information on the tools provided by external providers can be found in the section dedicated to the tools we use.	
<b>Fulfillment of obligations related to the protection of personal data</b>	As a personal data Administrator, we are obliged to fulfill our obligations related to personal data protection. Therefore, we may process your personal data to such an extent as it is necessary for the fulfillment of these obligations (i.e. when handling your request related to your personal data). The scope of data depends on what data we need to fulfil the obligation and prove our compliance with the GDPR. In addition, in this case, we also base on our legitimate interest, which is securing the data that is necessary to demonstrate accountability.	Article 6(1) (c) GDPR, Article 6(1) (f) GDPR, Article 9(2) (d) GDPR, Article 9(2) (f) GDPR
<b>Comment/opinion /feedbacksupport</b>	<p>When adding a comment/opinion, you must provide the data necessary to publish the comment/opinion specified in the form intended to leave a comment/opinion.</p> <p>Providing data is the condition for the publication of a comment/opinion.</p> <p>In addition, the comment/feedback system saves your IP address, which you used to send your comment/feedback. In order to publish a question on the Ponton Group's online forum, it is necessary to create an account with an e-mail, username and password.</p> <p>The comment/feedback system can be provided and handled by an external provider. When this is the case, using the system falls under the Terms and Conditions and Privacy Policy of the external provider. Detailed information on the tools provided by external providers can be found in the section dedicated to the tools we use.</p> <p>The data is processed in order to publish a comment/opinion, which constitutes our legitimate interest.</p> <p>When you add a comment or opinion and the data in your settings is public, it will be visible on the website. You can modify or delete your comment or opinion at any time. The deleted comment/opinion along with your data is transferred to the archive for the purposes of possible determination, pursuing or defending claims related to the comment/ opinion/feedback.</p>	Article 6(1) (f) GDPR
<b>Conducting current recruitment processes</b>	<p>In connection with the recruitment process, you must provide us with certain personal data so that we can take your application into account. If you apply for an employment relationship, the scope of the required personal data is determined by the provisions of the Labor Code. For the purposes of the recruitment process, you must provide us with your name(s) and surname; date of birth; contact details (e-mail address, telephone number), and if it is necessary for performing work of a specific type or for holding a specific position, also the information about education, qualifications, and previous employment. Such personal data is processed in order to fulfill the legal obligations provided for in the Labor Code, as well as to conclude an employment contract.</p> <p>If the recruitment process is aimed at establishing collaboration based on a civil law relationship, the essential data will be processed in order to conduct the current recruitment procedure and conclude a civil law contract (Article 6(1) (b) of the GDPR).</p> <p>In the case of data provided voluntarily by the candidate, it will be processed on the basis of consent (Article 6(1) (a) of the GDPR, Article 9(2) (a) of the GDPR).</p> <p>Providing data is voluntary, but necessary to participate in the current recruitment process.</p>	Article 6(1) (c) GDPR in connection with the provisions of the Labor Code, Article 6(1) (b) GDPR
<b>Data retention for the needs of future recruitment processes</b>	If you intend to participate not only in the current recruitment process but also in our future recruitment, you can grant us consent to store your personal data in order to take your application into consideration also in our future recruitment processes.	Article 6(1) (c) GDPR in connection with the provisions of the Labor Code, Article 6(1) (a) GDPR



Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

	<p>If you grant us such consent, we will process the personal data you provided us with when applying for a job. In this case, the legal basis for data processing is primarily your consent (Article 6(1) (a) of the GDPR). If we decide to take your candidacy into consideration in the future recruitment process, we will process your data in order to fulfill the obligations provided for in the Labor Code (Article 6(1) (c) of the GDPR) or for the purpose of concluding a civil law contract (Article 6(1) (b) of the GDPR).</p> <p>Granting consent to participate in future recruitment is not obligatory.</p>	
<p><b>Fulfillment of obligations related to providing employment</b></p>	<p>In connection with our search for employees and collaborators, we also fulfill various obligations related to establishing employment, storing documentation, etc. Among other things, we are obliged to prepare a draft contract for you, as well as other documents and statements that are provided for as part of legal obligations or our internal procedures. In addition, if you are a foreigner, the provisions of Polish law may require us to apply to the competent state authorities, as well as to comply with other formalities related to the employment of foreigners.</p> <p>Depending on the scope of your duties, before entering into an employment relationship with you or before establishing collaboration, we will also need to have access to your documentation, as well as to your data necessary for us to fulfill the obligations under the Act on Counteracting Threats of Sexual Crime and Protection of Minors of 13 May 2016 (Journal of Laws of 2024, item 560). The legal basis for processing your personal data is Article 6(1) (c) of the GDPR in connection with the relevant provisions of the Labor Code, 6(1) (b) of the GDPR, as well as our legitimate interest, which in this case constitutes carrying out the employment process efficiently and effectively.</p> <p>Providing the data required by labor law is necessary for the fulfillment of the indicated obligations.</p>	<p>Article 6(1) (c) GDPR in connection with the relevant provisions of the Labor Code, Article 6(1) (b) GDPR, Article 6(1) (f) GDPR</p>
<p><b>Handling feedback and complaints</b></p>	<p>The Foundation has procedures in place to handle complaints or feedback related to the Foundation's activities. They are both external and internal. When we receive a complaint or feedback, we must register it and investigate the case. Where necessary, we take action to clarify the matter and implement remedial actions in accordance with the procedures. Where it is required by law, information about the case shall be handed over to the relevant law enforcement authorities. The procedures in place include:</p> <ul style="list-style-type: none"> <li>• Standard Operating Procedures for Complaints and Feedback of the Foundation for Women and Family Planning: <a href="https://federa.org.pl/wp-content/uploads/2024/08/SOP-dot.-skladania-skarg-i-informacji-zwrotnej.pdf">https://federa.org.pl/wp-content/uploads/2024/08/SOP-dot.-skladania-skarg-i-informacji-zwrotnej.pdf</a></li> <li>• Anti-mobbing and anti-discrimination procedure of the Foundation for Women and Family Planning: <a href="https://federa.org.pl/wp-content/uploads/2024/05/PROCEDURA-ANTYMOBBINGOWA-I-ANTYDYSKRYMINACYJNA.pdf">https://federa.org.pl/wp-content/uploads/2024/05/PROCEDURA-ANTYMOBBINGOWA-I-ANTYDYSKRYMINACYJNA.pdf</a></li> </ul> <p>The legal basis for processing your data is Article 6(1)(c) of the GDPR in connection with the relevant provisions of the labor code, Article 6(1) (b) of the GDPR, as well as our legitimate interest, which in this case constitutes the improvement of the way the Foundation operates, as well as preventing irregularities.</p>	<p>Article 6(1) (c) GDPR in connection with the relevant provisions of the Labor Code, Article 6(1) (f) GDPR</p>

## # 5: What information about you do we have?

For each of the purposes described above, we may process a different scope of data – as necessary to achieve a specific purpose. The processed data includes, for example, information such as:

- name and surname,
- e-mail address,
- telephone number,
- IP address,
- image,
- voice recording,
- delivery address,
- billing details,
- bank account number,
- data provided as part of the correspondence,
- data provided in connection with the use of our support,
- data collected in the mailing system,
- information visible on social media profiles,
- the information included in correspondence,
- the information included in the comment/opinion,
- Anonymous Information.

## # 6: What is ‘Anonymous Information’?

We use tools that collect a range of information about you that is related to the use of our websites. This particularly refers to the following pieces of information:

- information on the operating system and web browser,
- viewed subpages,
- time spent on the website,
- transitions between particular subpages,
- clicks on individual links,
- mouse movements,
- page scrolling,
- the source from which you go to the website,
- the age bracket you are in,
- your gender,
- your approximate location limited to the city/town, etc.
- your interests or other preferences based on your online activity.

In this Privacy Policy, these pieces of information are referred to as ‘Anonymous Information.’

Anonymous Information is not, in our opinion, personal information as such, since it does not allow us to identify you and we do not combine it with typical personal information we collect about you. Nevertheless, taking into consideration the strict case law of the Court of Justice of the European Union and the divided opinions among lawyers, out of caution, in case Anonymous Information is considered as having the nature of personal data, in this Privacy Policy, we have also included detailed explanations about the processing of such information.

We are not able to provide you with access to Anonymous Information about you because we are unable to attribute any of the Anonymous Information to any particular user. From the level of tools responsible for collecting Anonymous Information, we only have access to a set of statistics and those pieces of information that are not assigned to specific individuals.

The Processing of Anonymous Information allows us to provide you with the possibility to use the functionalities available on the website. In addition, Anonymous Information is used for analytical, statistical, and marketing purposes, such as setting and targeting advertisements.

Anonymous Information is also processed by the tool providers on the terms resulting from their Terms and Conditions and Privacy Policies. They may be used by these providers to provide, improve, and manage their services, develop new services, measure the effectiveness of advertising, protect against fraud and abuse, and personalize the content and advertising you see on individual services, websites, and applications. Detailed information related to these instances can be found in the Cookies Policy, in the section dedicated to the tools we use.

## # 7: Where do we get the information about you from?

In most cases, we receive them directly from you. For instance, this happens when you write an e-mail to us, call us, subscribe to our bulletin/newsletter, and use the functionalities available on our website or on external platforms (e.g. social media).

If we organize events in collaboration with another entity, we may receive your data from the co-organizer who provides it to us for the purposes of organizing the event.

In addition, some pieces of information about you may be automatically collected by the tools we use. For detailed information on external tools, please check the appendix to the Cookies Policy.

## # 8: Is your data safe?

We care about the security of your personal data. We have analyzed the risks associated with particular proceedings of processing your data and we have implemented appropriate security and personal data protection measures. We monitor the condition of the technical infrastructure on an ongoing basis. We also constantly train our employees, carefully observe the procedures applied, and introduce the necessary improvements.

## # 9: How long will we store your personal data?

We process your personal data for as long as it is necessary within the scope of the particular purpose of processing such data, and therefore the processing periods vary depending on the purpose. Please note that the end of the processing of your data for one purpose does not necessarily lead to the complete deletion or destruction of your personal data, as the same set of data may be processed for a different purpose, for the period indicated for it. The complete deletion or destruction of data is carried out when we have completed all the purposes and in other cases, as indicated in the GDPR.

The retention periods have been presented in the table below.

Purpose of data processing	Data retention period
Activities related to assistance and counseling (medical and psychological support)	For the period necessary to provide support

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

Legal assistance and representation before competent authorities or courts	Until the end of the provision of legal aid
Organization of training courses, events, meetings, workshops, etc.	For the time necessary to organize and run the event
Research, advisory, and expert activities	Until the completion and settlement of a given project
Publication of stories of violations of reproductive rights	Until the case is deleted
Financial and material support for the Foundation (donations, fundraising, other forms of transferring funds to the Foundation)	For the period needed to complete the necessary accounting and settlement activities after providing support.
Bulletin / Newsletter	Until the user unsubscribes from the newsletter
Tax and accounting obligations	For the period required by law
Archive	Until the information is no longer useful
Defending, establishing or pursuing legal claims	Until the statute of limitations for claims
Ad audiences	Until the information is no longer useful or the user objects to the data processing
Social media	For the period the information is available on a social media platform
Analysis and statistics	Until the information is no longer useful or the user objects to the data processing
Marketing activities	Until the information is no longer useful or the user objects to the data processing
Contact and correspondence	For the duration of the contact between us
Additional tools	Until the information is no longer useful or the user objects to the data processing
Obligations related to the protection of personal data	Until the expiry of the limitation period for our liability as the personal data Administrator
Conducting current recruitment processes	Until the end of the current recruitment process
Data retention for the needs of future recruitment	For a period of 12 months
Fulfilment of obligations related to providing employment	For the period required by law
Handling feedback and complaints	Until the case is considered/resolved

## # 10: Who are the recipients of your personal data?

We will dare to say that the modern world is not able to operate without services provided by third parties. We also use such services. Some of these services are associated with the processing of your personal data. The external service providers that are involved in the processing of your personal data are listed in the table below.

Processing entity	Purpose of collaboration with the processing entity
Hosting provider	Data storage on the server
Invoicing system provider	Invoicing
Mailing system provider	Newsletter service
Mailing system provider	Handling e-mail correspondence
Landing pages system provider	Landing pages support
Cloud service provider	Handling current processes, storing and archiving data
Accounting office	Accounting/book-keeping
CRM System Provider	Project management, streamlining work
Technical support	Technical support related to the areas with personal data
Electronic communication service providers	Ongoing internal and external communication

Appendix to Resolution No. 8/2024/Z of the Management Board  
of the Foundation for Women and Family Planning of 19 July 2024  
on the adoption of the Privacy Policy of the Foundation for Women and Family Planning

Payment service providers	Handling payments (donations)
Funders	Implementation and financing of projects
IT software provider	Technical support for IT processes
Mail service providers	Handling correspondence
Experts in the fields related to the scope of activities performed by the Foundation	Counseling
Anti-fraud solution providers	Counteracting fraud within IT systems (e.g. as part of the donations)

If necessary, your data may be made available to the legal adviser, attorney-at-law, or advocate bound by professional secrecy. The necessity may arise from the need to use legal assistance that requires access to your personal data.

Your personal data may also be transferred to tax offices and the Social Insurance Institution to the extent necessary to fulfill tax, settlement, accounting, and insurance obligations. This applies in particular to any declarations, reports, statements, and other accounting or insurance documents that include your personal data.

In addition, if necessary, your personal data may be made available to entities, bodies, or institutions authorized to obtain access to data on the basis of legal provisions. These include police, Security Service, courts, prosecutor's offices.

In terms of Anonymous Information, it is available to providers of tools and solutions collecting Anonymous Information. The providers of these tools are independent administrators of the data collected within them and may share this data on the terms set out by them in their own Terms and Conditions and Privacy Policies, which we have no influence on. The list of external tools can be found in the appendix to the Cookies Policy.

## # 11: Do we transfer data to third countries or international organizations?

Yes, some of the proceedings related to the processing of your personal data may involve the transfer of your personal data to third countries.

We transfer your personal data to third countries in connection with the use of tools using resources located in third countries, in particular in the USA, to the extent necessary to achieve the objectives inscribed in the Foundation's activity. The providers of these tools guarantee a relevant level of personal data protection through appropriate compliance mechanisms provided by the GDPR, in particular through the use of standard contractual clauses.

In addition, Anonymous Information collected with the use of the tools indicated in the appendix to this Privacy Policy may be transferred to third countries, in particular to the USA.

## # 12: Do we use profiling?

We do not make any decisions about you based solely on automated processing, including profiling, which would produce legal effects concerning you or significantly affect you in a similar way. Nevertheless, we use tools that allow us to take specific actions depending on the information we have collected as part of tracking mechanisms. However, in our view, these actions do not have a significant impact on you as a natural person since neither they differentiate you as a person nor do they affect the conditions for providing you with our support, etc.

With the use of particular tools, we may, for instance, send personalized advertising to you, based on your previous activities on the website. This solution is called behavioral advertising. We encourage you to learn more about behavioral advertising, in particular with regard to issues related to privacy. Detailed information on the subject, including the possibility of managing your settings in terms of behavioral advertising, can be found [here](#).

## # 13: What are your rights?

The GDPR grants you the following potential rights related to the processing of your personal data:

- the right to access your data and receive a copy of it;
- the right to rectify (correct) your data;
- the right to delete your data (if in your opinion there are no grounds for us to process your data, you can request that we delete it);
- the right to restriction of processing of your data (you can request that we limit the processing of your data only to their storage or carrying out activities agreed upon with you, if in your opinion the data we have is incorrect or we have no grounds to process it);
- the right to object to the processing of your data (you have the right to object to the processing of data on the basis of a legitimate interest; you should indicate the specific situation which in your opinion justifies the termination of the processing covered by the objection; we shall cease to process your data for these purposes, unless we demonstrate that the grounds for data processing override your rights or that your data is necessary to establish, pursue or defend claims);
- the right to transfer your data (you have the right to receive the personal data that you have provided on the basis of a contract or your consent in a structured, commonly used and machine-readable format; you can request this data to be sent directly to another entity);
- the right to withdraw consent to the processing of your personal data, if such consent has been previously given;
- the right to lodge a complaint with the supervisory authority (if you find that we process your data unlawfully, you can lodge a complaint with the President of the Office for Personal Data Protection or another competent supervisory authority).

The regulations related to the exercise of the above-mentioned rights are described in detail in Articles 15-21 of the GDPR. We encourage you to learn more about these regulations. As for our part, we consider it necessary to clarify that the rights indicated above are not absolute and will not be granted to you in relation to all processing activities of your personal data.

However, we also emphasize that one of the rights indicated above is non-alienable and absolute: if you believe that we have violated the provisions on the protection of personal data when processing your personal data, you have the right to lodge a complaint with the supervisory authority (the President of the Office for Personal Data Protection).

## # 14: Do we use cookies or other similar technologies and what does it involve?

Our websites, like almost all other websites, use cookies and other similar technologies, such as tracking codes or tracking pixels, conversions API, etc.

The use of cookies and other similar technologies enables the collection of specific pieces of information that are later used for various purposes, starting from ensuring the proper operation of particular features and functionalities of the website and the analysis of user behavior on the website, to the targeted advertising.

To find out more about cookies and other similar technologies, please read the following:

- [more about cookies](#),
- [more about tracking pixels](#),
- [more about conversations API](#)

For greater clarity and transparency, we have also created a separate Cookie Policy, dedicated to the website you are currently on. To find out more, click [HERE](#).

## **# 15: How can you manage your privacy?**

The answer to this question can be found in many places in this Privacy Policy, where particular tools, behavioral advertising, etc. are described. Nevertheless, for your convenience, we have summarized this information once again in one place. You will find a list of options for managing your privacy below.

- privacy settings within the web browser;
- browser plugins that support privacy management, i.e. Ghosters;
- additional software supporting privacy management;
- incognito mode in a web browser;
- behavioral advertising settings, i.e. [youronlinechoices.com](https://youronlinechoices.com);
- privacy solution available from our website;
- privacy settings within particular social media platforms.

## **# 16: Is there anything else you need to know?**

As you can see, personal data processing, the use of cookies, and privacy management in general are quite complicated subjects. We have made every effort to ensure that this document provides you with the most extensive knowledge of issues that are important to you. If anything seems unclear to you, you want to learn more, or just would like to talk about your privacy, please email us at: [kontakt@federa.org.pl](mailto:kontakt@federa.org.pl).

## **# 17: Can this Privacy Policy be modified?**

Yes, we may modify this Privacy Policy, in particular due to technological changes and changes in the law. If you have subscribed to the newsletter, whenever a change to the Privacy Policy is implemented, you will receive a relevant notification. All archival versions of the Privacy Policy are linked below.

The Privacy Policy is effective as of 12 August 2024.