

# **Public Policy on the Processing of Personal Data of the Association of Volunteer Centers, Non-Profit Organizations, and Public Development Institutes "Dobro.rf"**

## **1. General Provisions**

1.1 This Public Policy on the Processing of Personal Data of the Association of Volunteer Centers, Non-Profit Organizations, and Public Development Institutes "Dobro.rf" (hereinafter – the "Policy") is developed in accordance with the requirements of Federal Law No. 152-FZ dated July 27, 2006, "On Personal Data" and defines the principles for processing and ensuring the security of personal data in the Association of Volunteer Centers, Non-Profit Organizations, and Public Development Institutes "Dobro.rf" (hereinafter – the "Dobro.rf Association," the "Association").

1.2 This Policy applies to all processes of personal data processing in the Dobro.rf Association, both with the use of automation tools and without such use, to all structural divisions and employees of the Association involved in such processes, as well as to the information systems of the Association used in personal data processing processes.

1.3. The Policy is approved by an order of the Dobro.rf Association.

1.4. Amendments (additions) to the Policy, including its appendices, are made by the Dobro.rf Association unilaterally.

## **2. Key Terms Used in the Policy**

2.1. Personal data – any information relating to a directly or indirectly identified or identifiable individual (personal data subject);

2.2. Operator – a state body, municipal body, legal entity, or individual that independently or jointly with other persons organizes and/or carries out the processing of personal data, and also determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data;

2.3. Processing of personal data – any action (operation) or set of actions (operations) performed with personal data using automation tools or without such use, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data;

2.4. Automated processing of personal data – processing of personal data using computer technology;

2.5. Distribution of personal data – actions aimed at disclosing personal data to an indefinite circle of persons;

2.6. Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific circle of persons;

2.7. Blocking of personal data – temporary suspension of processing personal data (except for cases where processing is necessary to clarify personal data);

2.8. Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or which result in the destruction of tangible media containing personal data;

2.9. Depersonalization of personal data – actions as a result of which it becomes impossible, without the use of additional information, to determine the belonging of personal data to a specific personal data subject;

2.10. Personal data information system – a set of personal data contained in databases and information technologies and technical means ensuring their processing;

2.11. Authorized user – an individual who has undergone the registration, identification, authentication, and authorization procedure in the Unified Information System for the Development of Volunteering (hereinafter – the "[Dobro.org](https://dobro.org) platform"), who has provided consent to the processing of personal data, accepted the Policy on the Processing of Personal Data in the Dobro.rf Association, the User Agreement, and the Website Terms of Use;

2.12. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual, or a foreign legal entity.

### 3. Principles and Rules for Processing Personal Data

3.1 The processing of personal data by the Dobro.rf Association is carried out on a lawful and fair basis and is limited to achieving specific, predetermined, and legitimate purposes. Only personal data that meet the purposes of their processing are processed. The content and volume of personal data processed by the Dobro.rf Association correspond to the stated processing purposes; redundancy of processed data is not permitted.

3.2 When processing personal data, the Dobro.rf Association ensures the accuracy, sufficiency, and, where necessary, the relevance of personal data in relation to the purposes of processing. The Dobro.rf Association takes necessary measures to delete or clarify incomplete or inaccurate personal data.

3.3 Storage of personal data in the Dobro.rf Association is carried out in a form that allows identification of the personal data subject, for no longer than required by the purposes of personal data processing, unless the storage period is established by federal law, a regulatory legal act, or a contract where the personal data subject is a party, beneficiary, or guarantor. Processed personal data are subject to destruction or depersonalization upon achieving the processing purposes, unless otherwise provided by federal law.

3.4 Processing of personal data in the Dobro.rf Association is carried out both in an automated manner in personal data information systems and without the use of automation tools (on paper).

3.5 The Dobro.rf Association does not make decisions regarding a personal data subject based solely on automated processing.

3.6 The Dobro.rf Association, with the written consent of the personal data subject, publishes their contact details (full name, position, work phone number, e-mail, etc.) in publicly available sources for the purpose of communication in the course of its activities.

3.7 Cross-border transfer of personal data is not carried out in the Dobro.rf Association. The processing of personal data of Russian citizens by foreign organizers of charity and volunteer activities when using the resources of the [Dobro.org](https://dobro.org) platform in the process of preparing and conducting online events is carried out exclusively on the territory of the Russian Federation. All actions for processing personal data of Russian citizens by foreign organizers of charity and volunteer activities occur on information carriers located on the territory of the Russian Federation, owned and used by the Dobro.rf Association. The transfer of personal data of Russian citizens to the territory of a foreign state during their processing by foreign organizers of charity and volunteer activities is not permitted. A foreign organizer of charitable and volunteer activities, when carrying out actions to process personal data while using the information resources of the [Dobro.org](https://dobro.org) platform, undertakes not to allow copying or transfer of personal data of Russian citizens to technical carriers located on the territory of a foreign state.

3.8. An Authorized user (personal data subject) has the right to withdraw their consent to the processing of personal data. If an Authorized user (personal data subject) withdraws consent to the processing of their personal data, they can delete the provided personal data via the link <https://dobro.org/volunteers/edit>. In case of refusal to consent to the processing of personal data and/or failure to provide data required for maintaining and administering the [Dobro.org](https://dobro.org) platform, the Authorized user will not be able to access the Services of the [Dobro.org](https://dobro.org) platform or register on it.

#### 4. Categories of Personal Data Processed in the Dobro.rf Association

4.1 The Dobro.rf Association does not process special categories of personal data concerning race, ethnicity, political views, religious or philosophical beliefs, and intimate life of personal data subjects, nor personal data concerning criminal records.

4.2 The Dobro.rf Association may process information about the health status of employees for the purposes of compliance with labor legislation, legislation on state social assistance, and pension legislation of the Russian Federation.

4.3 The Dobro.rf Association does not process biometric personal data (special biometric photographs). If necessary, such processing is carried out only with the written consent of the personal data subject.

4.4 The list of categories of personal data subjects whose data is processed in the Dobro.rf Association, the composition of such data, purposes, and legal grounds for processing are defined in the document "List of Personal Data Processed in the Dobro.rf Association."

## 5. Entrustment of Personal Data Processing

5.1 The Dobro.rf Association has the right to entrust the processing of personal data to other persons with the consent of the personal data subject in accordance with Article 6 of the Federal Law "On Personal Data".

5.2 The Dobro.rf Association entrusts the processing of personal data of Authorized users to the following personal data operators:

– regional representatives of the Unified Information System for the Development of Volunteering, operating in accordance with paragraph 9 of the Rules for the Functioning of the [Dobro.org](#) platform, approved by Decree of the Government of the Russian Federation No. 1067 dated August 17, 2019, "On the Unified Information System for the Development of Volunteering" (hereinafter – the "Decree");

- The Ministry of Education of the Russian Federation for the purpose of forming a register of mentors involved in individual preventive work with minors and a register of organizations participating in activities for the prevention of neglect and juvenile delinquency;
- public assistance centers, which are defined in accordance with Order of the Ministry of Labor and Social Protection of the Russian Federation No. 623 dated November 18, 2024;
  - executive bodies of the subjects of the Russian Federation exercising powers in the field of volunteering, in accordance with paragraph 9 of the Rules for the Functioning of the [Dobro.org](#) platform, approved by the Decree;
  - Dobro.Centers – public development centers opened by the User on the basis of a License Agreement with the Dobro.rf Association for the purpose of providing services to beneficiaries (individuals or legal entities who have applied to the Dobro.Center for information and support on public development, volunteering, charity, and the development of civic initiatives) according to uniform standards of the federal network within the territory where the Dobro.Center is located – for the purpose of implementing concluded License Agreements with the Dobro.rf Association;
  - other operators of information systems, including operators of information systems of federal executive bodies and executive bodies of the subjects of the Russian Federation that carry out information interaction with the [Dobro.ru](#) platform;
  - legal entities and public associations conducting events involving Authorized users;
  - legal entities and public associations providing charitable donations to beneficiaries in case of concluding a charitable donation agreement between the donor and the beneficiary;

- legal entities that own information systems interacting with the [Dobro.org](#) platform, including in accordance with paragraph 2 of the Rules for Information Interaction of the [Dobro.org](#) platform with Other Information Systems, approved by the Decree;
- legal entities that ensure transportation of volunteers, organizers of volunteer activities, representatives of volunteer organizations to the venue of events involving volunteers;
- legal entities that ensure accommodation of volunteers, organizers of volunteer activities, representatives of volunteer organizations at the venues of events involving volunteers;
- legal entities that ensure other forms of support for conducting events involving volunteers.

## 6. Implemented Measures to Ensure Personal Data Security

6.1 The following measures to ensure personal data security have been implemented in the Dobro.rf Association:

- a) A person responsible for ensuring personal data security has been appointed;
- b) A system for protecting personal data in personal data information systems has been created;
- c) A security regime for premises where personal data processing takes place has been established, preventing the possibility of uncontrolled entry or presence in these premises by persons without access rights;
- d) The procedure for granting access to process personal data and access to personal data information systems has been defined;
- e) Accounting for machine-readable personal data carriers has been organized;
- f) The security of tangible (paper) personal data carriers has been ensured;
- g) An assessment has been made of the harm that may be caused to a personal data subject in case of violation of the requirements of the Federal Law "On Personal Data";
- h) Detection of facts of unauthorized access to personal data and measures taken on such facts are carried out;
- i) Restoration of personal data modified or destroyed as a result of unauthorized access is ensured;
- j) Periodic checks of compliance with the procedure for processing and ensuring the security of personal data are conducted.

## 7. Specifics of Processing Donorship Data

7.1. Within the services of the [Dobro.org](#) platform, the following personal data related to health status are processed:

- Dates and types of donations;

- "Honorary Donor" status;
  - Other information related to blood and its donation.
- 7.2. The specified data are received from the Federal Medical–Biological Agency of Russia on the basis of an information interaction agreement.
- 7.3. Purposes of processing donation data:
- Displaying information in the user's personal account;
  - Forming personalized notifications about the possibility of donation;
  - Public display (subject to appropriate privacy settings).
- 7.4. Measures to protect donation data:
- Encryption during transmission and storage;
  - Restricted access to data;
  - Two–factor authentication when changing visibility settings;
  - Regular security audits.
- 7.5. The User has the right to:
- Change the visibility settings of donation information;
  - Disable notifications about the possibility of donation;
  - Request deletion of donation information.