

**F 4.0**



**PRIVACY POLICY AND PERSONAL DATA  
PROTECTION**

**THE 4.0 FOUNDATION**

**SOFIA**

**2023**

## TRANSPARENCY IN THE PROCESSING OF PERSONAL DATA

As an administrator of personal information, Foundation 4.0 (40F) has a duty to inform all interested parties about the processing of a wide range of personal data.

The information that may contain your personal data is processed for the following purposes:

- ✓ Human Resources;
- ✓ Contractors;
- ✓ Contractors, donors and investors providing grant funding and donations;
- ✓ Communication with donor countries related to 40F's founding work in education, health, innovation, etc.
- ✓ Information input from public calls for proposals for funding of project proposals;
- ✓ Information input from public or closed procedures for the expenditure of public funds within the legislative framework, including the Public Procurement Act, adjacent decrees, communication with the Public Procurement Agency, etc.
- ✓ Complaints, signals and other requests;
- ✓ Exercise of rights within the meaning of Regulation (EU) 2016/679 before the 40F in its capacity as data controller and private data administrator;
- ✓ 40F Code of Conduct and Internal register of breaches of Regulation (EU) 2016/679;
- ✓ Data Breach Notifications; notifications to the CPD;
- ✓ Reports according to the Money Laundering Measures Policy, AML Acts (in Bulgaria, and EU)
- ✓ Newsletter subscribers.

40F collects and processes personal data in both English and Bulgarian, as well as translations of personal documentation by a sworn translator. In rare cases, according to the requirements of the organization's core activities, it may also collect data in other languages according to the competence of the internal administration.

## HUMAN RESOURCES

For the purposes of human resources management, we process personal data of job applicants, current and former 40F employees.

In the course of human resources management activities, we process personal identification data, education and qualification data, health data, contact data, as well as other data required under the special laws governing employment and labour relations, tax and social security relations, business accounting, occupational health and safety, and social matters.

The data collected shall be used only for the purposes mentioned above and shall be made available to third parties only in cases where this is provided for by law. In such cases, data may be provided, for example, to the NRA, the Court of Auditors, the General Labour Inspectorate in Bulgaria and other public EU institutions. In the cases of US employees, the 40F follows the state regulations accordingly in view of their powers and competence. The information is not stored outside the EU and the European Economic Area. 40F shall ensure appropriate technical and organisational measures to protect personal data. In connection with the performance of an employment or service relationship, only the personal data required by law is processed and stored for the periods prescribed by employment and social security legislation. Staff selection procedures shall comply with the requirements of the specific laws governing this activity.

The 40F sets a time limit of three years for the storage of personal data of participants in recruitment procedures. Where a selection procedure requires the submission of originals or notarised copies of documents certifying the applicant's physical and mental fitness, the requisite qualifications

and the experience required for the post to be filled, the data subject who is not approved for appointment may request, within 30 days of the final conclusion of the selection procedure, to have the documents returned. The 40F shall return the documents in the manner in which they were submitted.

Health and safety at work activities shall be governed by a contract with the occupational health service in accordance with Ordinance No 3 of 25 January 2008 in Bulgaria on the conditions and procedure for the operation of occupational health services.

## CONTRACTORS

In line and during the performance of its core activities in the fields of education, health, innovation, etc., as well as in connection with the receipt or provision of grant financial assistance, 40F processes personal data of individuals for the performance of contracts it concludes under the Law on Obligations and Contracts (LOC), the Public Procurement Act (PPA), the Commercial Law, etc.

To the extent that personal data of individual natural persons is processed in connection with the performance of these contracts, information about them is processed to the minimum extent sufficient only for the accurate performance of the obligations under the relevant contract. Access to this information shall only be granted to third parties where this is provided for by law. 40F does not provide personal data of individuals acquired as a result of the core activities for financial gain or other commercial use.

## COMPLAINTS, ALERTS AND OTHER GRIEVANCE REQUESTS

Complaints, alerts, and other requests in connection with the exercise of 40F's core activities shall be submitted in accordance with the terms and conditions of the applicable legislation.

## PROCESSING OF PERSONAL DATA OF CHILDREN

As an element of 40F's core activity in the field of education, periodically the organisation collects data of pupils and young people to carry out its intended activities. Participation in 40F's projects is voluntary after informed consent and the data (name, age, school, etc.) are processed only for the purposes of the project or accompanying scientific publications. Within the framework of our activities, 40F may use or provide anonymised and pseudonymised data to third parties entirely within the scope of the intended activities. 40F does not provide personal data of individuals to third parties for commercial purposes.

## EXERCISE OF RIGHTS UNDER REGULATION (EU) 2016/679 TO F40 AS A PERSONAL DATA ADMINISTRATOR

Any interested person has the right to exercise his/her rights under Articles 15-22 of Regulation (EU) 2016/679 replacing Directive 95/46/EC (GDPR) before 40F concerning the personal data that 40F processes about them.

When submitting requests for the exercise of rights under Regulation (EU) 2016/679 to 40F, you will be required to identify yourself - either by providing proof of identity, by electronic signature or by other methods and means of identification. The personal data processed in connection with the processing of individual requests will only be used for the purposes of exercising those rights. In this respect, personal data may only be disclosed to third parties if provided by law. As part of this, 40F maintains a code of conduct and an internal register of breaches of [Regulation \(EU\) 2016/679](#) and the Data Protection Act (DPA). Also, a register of data breach notifications. These registers are maintained in relation to the requirements of Regulation (EU) 2016/679 and the DPA. Insofar as these registers

contain personal data, they are subject to the special procedures for maintaining, as well as the procedures for accessing it, in accordance with the Rules of Administrative Procedure of 40F.

**NEWSLETTER SUBSCRIBERS**

40F produces a short newsletter on selected funding opportunities, important news, events, and information about 40F's practice as a fundraising organisation. To receive the newsletter, users register by providing 40F with their name and email address. Whether or not the e-mail address constitutes personal data in a particular case, 40F uses the provided e-mail addresses only for the purpose of delivering the Newsletter. Individuals have the right to opt out of receiving the newsletter at any time by requesting this by e-mail to 40F without giving reasons for doing so. Also, at the end of each newsletter there is brief information on the possibility and procedure for unsubscribing.

**COLLECTION OF PERSONAL DATA FOR THE PURPOSE OF PROVIDING INFORMATION ON QUESTIONS FROM USERS ON THE 40F WEBSITE**

When asking a question or submitting a complaint via the forms provided for this purpose on the website, including e-mail and the chat function, as well as when subscribing to the 40F newsletter, the user provides personal information that is necessary to perform the relevant service. This information is recorded in a database located in the cloud space of our website hosting provider, [wix.com](https://www.wix.com). 40F uses the provided information only to perform the service the user has requested and does not provide this information to third parties. The information is subject to daily back-up. Access to the cloud space is two-tiered from two different devices, which is considered as a high level of security when managing personal data with remote access.

**COOKIE POLICY**

"A cookie" is a small amount of data that a website stores on a visitor's computer or mobile device. Our website uses cookies necessary for its functioning. The cookies used serve to distinguish sessions, to define new sessions, to submit requests, to operate the consent banner with the cookies used etc. 40F provides users of the website and its services with the ability to restrict all cookies on initial access.

Our website uses the following cookies:

Name	Purpose	Duration	Cookie type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	12 months	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	Session	Essential

Name	Purpose	Duration	Cookie type
<b>consent-policy</b>	Used for cookie banner parameters	12 months	Essential
<b>smSession</b>	Used to identify logged in site members	Session	Essential
<b>TS*</b>	Used for security and anti-fraud reasons	Session	Essential
<b>bSession</b>	Used for system effectiveness measurement	30 minutes	Essential
<b>fedops.logger.X</b>	Used for stability/effectiveness measurement	12 months	Essential
<b>wixLanguage</b>	Used on multilingual websites to save user language preference	12 months	Functional

Please note that you can also disable both our cookies and third-party cookies by setting your browser accordingly. In this case, you may lose some of the functionality of some of the services. In the event that you use a link that takes you to another site, that site will have its own cookies and security policy over which we have no control.

For more information on how to manage cookies properly, why they are needed and how to set your browser correctly, you can check out the following resources:

- ➔ [All About Cookies](#)
- ➔ [Cookie settings in Firefox](#)
- ➔ [Cookie settings in Internet Explorer](#)
- ➔ [Cookie settings in Google Chrome](#)
- ➔ [Cookie settings in Safari \(OS X\)](#)
- ➔ [Cookie settings in Safari \(iOS\)](#)
- ➔ [Cookie settings in Android](#)

## LOG FILES

Like most websites, the **40F** website collects data in log files. This information includes your IP, which browser you are using (i.e. Mozilla, Chrome, Edge etc.), operating system (Linux, Windows, iOS), when you visited our page, sub-pages visited etc. We reserve the right to use users' IP addresses to disclose their identities in cases where this is necessary to comply with actions required of us by law. This information is stored in the cloud space of our hosting provider, **wix.com**, and is accessible only by our administrators.

## LINKS TO OTHER WEBSITES

This privacy policy does not cover links on the **40F** website to other websites. We encourage you to read the privacy statements of the other pages you visit.

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## CHANGES TO THE PRIVACY POLICY

We reserve the right to change our privacy policy.

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## 40 FOUNDATION CONTACTS

Sofia 1309, 119 Dimitar Petkov str.

E-mail: [office@40foundation.org](mailto:office@40foundation.org)

Webpage: [www.40foundation.org](http://www.40foundation.org)

If you have any questions about the processing of personal data by **40F** you can contact us at [office@40foundation.org](mailto:office@40foundation.org)\*

\*Used only for questions about the processing of personal data by **40F** as a data administrator and to exercise a right under Articles 15 - 22 of Regulation (EU) 2016/679. For all other general questions, PLEASE use [info@40foundation.org](mailto:info@40foundation.org).

This policy has been adopted by order No. 003 / 05.05.2023 issued by the 40 Foundation.

Sofia

05.05.2023