



# Privacy & Data Management Policy

## 1. Purpose of the Policy

The purpose of this Policy is to set forth the data management policy of Ligmincha International (554 Drumheller Ln., Shipman, VA 22971, U.S.A., tax number: 52-1772036 in accordance with the applicable data protection legislation. Ligmincha International complies with the data protection and privacy legislation in its operations, and its employees, volunteers and contractors are aware of the content of the data protection legislation and their obligations imposed by the authorities.

## 2. Subject and Scope of the Policy

The Policy covers:

- all personal data processed and stored by Ligmincha International
- the purpose and duration of the processing of the data
- the scope of Ligmincha International's activities and relations

All employees, volunteers and contractors must comply with this Policy when processing any kind of individual personal data. Ligmincha International also has appropriate processes in place to ensure that service providers and other companies conducting outsourced activities for Ligmincha International comply with the necessary requirements. The processing of personal data is limited to the shortest possible period of time. Duration of processing: for the time necessary for the purposes for which the personal data are processed or until their deletion at the request of the data subject. This Policy entered into force on Dec 8, 2022 .

## 3. Principles of Data Management

**Lawful basis of processing and transparency:** the processing of personal data by Ligmincha International complies with the law, the procedure is transparent for the data subject. Ligmincha International provides information to data subjects in a concise, accessible and easily understandable manner, in a clear and simple language.

**Purpose limitation:** personal data is collected only for specified, explicit and legitimate purposes and are not processed by Ligmincha International in a way incompatible with those purposes.

**Data minimization:** the personal data that has been processed is adequate and relevant for the purposes of the processing and limited to specific activities.

**Limited storage:** The personal data that has been processed is stored in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods only for the purpose of archiving data, for historical or scientific research purposes or for statistical purposes.

**Integrity and confidentiality:** Ligmincha International processes personal data in a way that ensures adequate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, by implementing appropriate technical or organizational measures.

**Accountability:** Ligmincha International is responsible for compliance with these rules and must be able to demonstrate such compliance.



#### **4. Rights of the data subjects**

Ligmincha International takes appropriate measures to provide the data subject with all information relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in a clear and simple language.

The information shall be provided in writing or by other means, including, where appropriate, by electronic means. Information may also be provided orally at the request of the data subject, provided that the identity of the data subject has been verified by other means.

The data subject shall have the right to receive feedback from Ligmincha International as to whether or not his or her personal data is being processed and, if such processing is ongoing, the right to access his or her personal data and information related to the processing.

The data subject shall have the right to have inaccurate personal data concerning him or her corrected by Ligmincha International without undue delay upon request.

Ligmincha International is obliged to delete personal data relating to the data subject without undue delay if:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there is no overriding legitimate ground for the processing; the personal data have been unlawfully processed.

The data subject has the right to have the processing limited by Ligmincha International at his or her request.

The data subject shall have the right to receive the personal data concerning him or her provided by him or her to Ligmincha International in a structured, commonly used, electronically readable format, and furthermore shall have the right to transmit such data to another data controller without Ligmincha International's intervention.

The data subject may request information about the processing of his or her personal data and may request the rectification or, except for processing required by law, the erasure of his or her personal data by the means indicated when the data were collected or by contacting Ligmincha International at: [office@ligmincha.org](mailto:office@ligmincha.org).

Ligmincha International will block the personal data if the data subject requests it or if it is likely that the deletion would harm the legitimate interests of the data subject. Blocked personal data may be processed only for as long as the processing purpose that precluded the deletion of the personal data persists. Ligmincha International will delete the personal data if the data subject requests it, or if the purpose of the processing has ceased, or if the statutory storage period has expired, or federal or state authorities ordered the cancellation. Ligmincha International has 30 days to delete, block or correct personal data after receipt of a request to do so.



## **5. Legal Bases for Data Processing**

Regulation (EU) 2016/679 of the European Parliament and of the Council Chapter II Article 6. Federal and state regulation - VCDP: <https://law.lis.virginia.gov/vacode/title59.1/chapter53/>

## **6. Data Storage and Security of Processing**

Ligmincha International handles the personal data collected in a manner that ensures the adequate security of personal data by applying appropriate technical or organizational measures. Ligmincha International shall implement appropriate technical and organizational measures to protect the data, taking into account the state of science and technology and the cost of implementation, the nature, scope, context and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural individuals, both in determining the method of processing and in the course of processing. Ligmincha International will take the utmost care to prevent the unauthorized or unlawful disclosure or processing, accidental loss, destruction or damage of information and data through appropriate confidentiality undertakings and technical and organizational security measures. Access to information is restricted to duly authorized staff who are bound by confidentiality obligations.

## **7. Duration of Data Processing, Modification and Deletion of Data**

The personal data provided to Ligmincha International will be kept by Ligmincha International only for as long as it is necessary for the purpose for which the data subject provided it or for as long as it is required to be kept by law.

The data provided by the user will be deleted or modified by the Ligmincha International within 10 working days upon written initiative of the user. This request can be made by e-mail at: [office@ligmincha.org](mailto:office@ligmincha.org).

## **8. Data Transmission**

We are aware of the value of data subjects' information and Ligmincha International will do its utmost to protect it in the course of its processing.

Personal data disclosed to Ligmincha International may be shared by Ligmincha International with its partners if this is necessary to achieve the purpose for which the data subject disclosed the data.

Ligmincha International may transfer the personal data collected to third parties providing information technology, identity management, website management, data analytics, backup, data security and storage, payroll, and healthcare services that process Ligmincha International's data, subject to appropriate security measures and contractual arrangements.

Ligmincha International may transfer your information to law enforcement authorities, regulatory or other governmental bodies or other third parties where we are required to do so by law, in accordance with applicable law.

We do not share information with other third parties and other partners for secondary or unrelated purposes, unless you have advised us otherwise at the time of the data collection.

## **9. Amendments to the Policy**

Ligmincha International reserves the right to amend this Privacy and Data Management Policy at any time by unilateral decision. Following any amendment to this Policy, all data subjects shall be duly informed on our website [ligmincha.org](http://ligmincha.org).



## 10. Governance

Regulation (EU) 2016/679 of the European Parliament and of the Council Chapter II Article 6.  
Federal and state regulation - VCDP: <https://law.lis.virginia.gov/vacode/title59.1/chapter53/>

## 11. Competent Authorities

If the data subject feels that Ligmincha International is not processing the personal data in accordance with the provisions of this Privacy Policy or the law in force, he or she may exercise a right of appeal or complaint to the agency that oversees data protection in the country of the data subject.

To exercise any such right, please contact the agency that oversees data protection in your country.

### Explanation of terms used in the Policy:

**Data Controller:** The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law”

### Personal Data

Personal data is any information relating to an identified or identifiable natural person (the "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data Subject:** Data subject means any identified or identifiable natural person whose personal data are processed by the controller.

**Processing:** Processing means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their future processing.

**Third party:** Third party means a natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons authorized to process the personal data under the direct responsibility of the controller or the processor.

**Consent:** Consent shall mean any freely given indication of the data subject's wishes for the specific case in an informed and unambiguous manner, in the form of a statement or any other unambiguous affirmative act by which the data subject signifies that he or she consents to the processing of personal data relating to him or her.