

DACAAR'S PRIVACY POLICY

1 ABOUT THIS POLICY

1.1 For DACAAR privacy is of great importance. We do everything we can to ensure that the personal information we collect in the organisation through our work is handled in a safe and secure manner and in accordance with the applicable law. As an organisation, we are particularly focused on our obligations as data controller and we do everything in our power to fulfil those obligations.

1.2 This Privacy Policy applies to all of the personal data that you provide us with or we collect about you when we employ you or if you are a supplier, or use our services, including browsing on our website. In this policy, you can read about what information we collect, how we handle them, how long we keep them, etc. You can also read about your rights and possibilities for redress. You should read this policy and contact us, if there is any information you do not understand or cannot accept. At www.dacaar.org you will be able to find an up-dated version of the policy at any time.

2 ORGANISATION RESPONSIBLE FOR DATA

2.1 The organization responsible for handling your personal information is:

DACAAR

Larsbjørnsstræde 3

1454 Copenhagen K

Phone: +45 20557978

Mail: klaus.lokkegaard@dacaar.org

CVR No .: 29 90 24 88

Questions about this policy and any inquiries regarding DACAAR's handling of your personal information, including inquiries about gaining insight, requests for rectification, and inquiries regarding suspicion of non-compliance with applicable laws, should be addressed to Head of Secretariat Klaus Løkkegaard, mail: klaus.lokkegaard@dacaar.org, mobile +45 20557978

3 DEFINITIONS

3.1 Below you find the definitions of some of the most important legal data concepts included in this policy:

Personal data

Any kind of information about an identified or identifiable natural person, i.e. all information, directly or indirectly, alone or in combination, that may identify a natural person.

Specific categories of personal data (sensitive personal data)

Information on race, ethnic origin, political, religious or philosophical beliefs or union affiliation, genetic data, health information or information about a person's sexual preferences or biometric data, if biometric data is treated with the sole purpose of identifying a natural person.

Handling

Any activity, or range of activities, involving the use of personal data, such as collection, registration, systematization, modification, search, assembly, or disclosure to people, authorities, companies, etc. outside of Dacaar.

Data Responsible

The natural or legal person, public authority, institution or other body that alone, or in conjunction with others, determines the purposes for which processing of personal data may be relevant.

Data Processor

The natural or legal person, public authority, institution or other body handling personal data on behalf of the data controller.

Data protection regulation

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC, and related regulations.

The Data Protection Act

Act on supplementary provisions for a regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such information (Law no. 502 of 23/05/2018).

4 THE PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION

4.1 The overall legal framework for processing of your personal data is the Data Protection Regulation and the Data Protection Act (see above). A basic principle of this is that personal data must be collected for explicitly stated and legitimate purposes and that they may not be used for other purposes. In accordance with this, we will process your personal information only if there is a clear and legitimate reason for this, and in each case, we aim to limit the amount of information needed to fulfill this purpose. Furthermore, the processing of your information will only be sustained for as long as the purpose still applies, including if we are required by law to store your information for a given period of time.

4.2 Whether you are a board member, an employee, a consultant, a resource person, a partner, provide services, are our contact person in an organization, company or authority, or if you have any other relationship with us, we need to process your personal information to such extent, that we can both fulfill our declaration of formal qualifications as an organization and meet the legal, contractual and other obligations we have as an organization – and provide you with the services you may require at the same time.

5 GATHERING AND USE OF YOUR PERSONAL INFORMATION

5.1 This information is collected directly from you:

5.1.1 When you visit our website, we collect data concerning the sites and functions, which you use. We also collect technical information about your device regarding geographical location at country level. We use this information to collect statistics about user behavior in order to develop and improve content on our website.

5.1.2 DACAAR's newsletter is sent via the Danish 'eMailPlatform'. If you sign up for our newsletter in English or Danish, we will only save your first and last name and your email address. You can unsubscribe at any time, either in the news mail itself or by sending an email to copenhagen@dacaar.org.

eMailPlatform continuously removes inactive contacts and keeps track of timestamps and IP addresses to document that we have your permission to send the newsletter email.

According to the new law, everyone on our contact list has the right to be informed of what we know about them. Through eMailPlatform, we can document the data that we have on our contacts, i.e. actions, tracking and statistics.

5.1.3 At present, DACAAR does not have Facebook, Twitter, LinkedIn or Instagram accounts. If we decide to get such in the future, we will explain and publish the handling of your personal data in this regard.

5.1.4 If you are involved with us, besides being a user of our website or receiving our newsletter bymail, we will collect some general contact information about you. If you are a board member, employee, trainee, consultant, resource person, partner or supplier of goods or services, if you are our contact person in an organisation, company or authority, if you appear in an article on our website or in one of our publications (both as interviewee and on photos) or if you are a recipient of such publication or other material from DACAAR, we collect the following general personal information from you: Name, Title, Organization, Email Address, and Phone Number. When there is a purpose, we will also collect the address, zip code, city and country, as well as in some cases, when necessary, other contact information from you, such as your Skype name. If you make a written request to DACAAR, we will also, for a period of time -depending on the number of contact details you include in your inquiry –keep basic personal information about you, similar to the above mentioned.

5.1.5 We collect photos from employees and people appearing in DACAAR's news articles and other communication material. This is also the case for the occasionally video material that is used on our website. This takes place according to prior agreement. If you give your consent to this, your photo or video material may also be used in other publications, for instance in articles published in the national/ international press and featured in the media in general.

5.1.6 If we are to take payment from you, we collect your account number and other relevant payment information from you.

5.1.7 If you apply for a job or internship at DACAAR, we collect a written application, a resumé and any diplomas and references from you. If you are hired or have achieved an internship with us in Denmark, we will also collect your social security number, contact details of your next of kin and information about your pension fund, if relevant. The CPR number is used for reporting to SKAT (tax authority) in Denmark. In addition, as an employer, we will regularly collect common employment-related personal information about you, such as training certificates/ requirements, etc.

5.1.8 We collect non-sensitive personal information about you (see section 3 above for specific categories of personal data). As an employer, we may in some cases require to receive health information from employees in order to meet our responsibilities, for example, if we have to report a work injury.

5.2 These are the personal information we collect from third parties about you:

5.2.1 In limited cases, you may need to collect personal information about you from third parties (non-sensitive personal data). This may, for example, be information from listed referees if you seek employment with us, or it may be your contact information if you work for an organisation, company or authority that we need to be in contact with. We will automatically collect relevant

tax information in connection with payroll for all our employees.

6 OUR BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

6.1 In order for us to handle your personal data, a valid legal basis must be provided in each case, as stated in Article 6 (1) of the Data Protection Regulation. 1. Our basis for handling your personal information is based on the presence of one or more of the following circumstances, depending on the situation.

6.2 In many cases, handling your personal information is based on the fact that such handling is necessary for us to prepare or fulfill a contract we enter into with you or that we can handle queries and the like, prior to your entering into an agreement with us. This typically applies if you, for example, are an area supplier of goods or services, or if you are a partner, resource person, consultant, employee or trainee. In this case, the legal basis for our handling is The Data Protection Regulation Article 6 1 (b).

6.3 In some cases, we are legally required to handle personal information about you, in accordance with, for example, the Posting Act, the Personal Tax Act or the Employment Proof Act, or in accordance with the Ministry of Foreign Affairs guidelines for grant commitments or other donor requirements related to the grants. Such an obligation may, for example, deal with the need for documentation of tracing transactions and the like in accordance with the rules in the Accounting Act. We are generally obliged to keep accounting records for 5 years from the end of the financial year. When we have a legal obligation to process your personal information, our basis for this is the Data Protection Regulation Article 6 (1). 1 (c).

6.4 In certain situations, we may also process your personal information if this is necessary for us to pursue a legitimate interest, provided that your right to protection of your personal information does not weigh heavier. In such cases, our basis for handling your personal data protection is Article 6 (1). 1 (f).

6.5 In other cases, our basis for processing your general personal data will be based on obtaining your consent, cf. Data Protection Regulation Article 6 1 (a). In such cases, it is our responsibility to ensure that your consent is voluntary and that it is specific, informed and unambiguous. In addition, you may revoke your consent at any time (see section 10 below).

6.6 DACAAR does not collect sensitive personal information about you (see section 3 above regarding specific categories of personal data).

7 SHARING YOUR PERSONAL INFORMATION

7.1 We may share your personal information with the suppliers and collaborators who assist us with our IT operations, web hosting, etc. In such cases, we enter into data processing agreements that ensure that your personal information is processed properly and in accordance with the law.

7.2 If you have entered into a contractual obligation with us or you are otherwise closely related to DACAAR, we may share your personal information with relevant suppliers, such as our bank, accountant, insurance company, payroll, etc. In such cases, we also include data handling agreements, which ensure that the handling of your personal information is carried out properly and in accordance with the law.

7.3 In addition to the above, we share your personal information to the extent that we are obliged to. For example, if we are obliged to report to public authorities, including tax authorities (SKAT).

8 SHARING YOUR INFORMATION WITH RECIPIENTS OUTSIDE EU / EEA

8.1 As DACAAR is an organisation whose overall objective is to help fight poverty and support development in Afghanistan, we have established our headquarters and a number of regional offices in Afghanistan. DACAAR is aware that Afghanistan belongs to the category of unsafe third countries, and therefore there are extraordinary exceptions that we adhere to. In extraordinary cases, and only when there is a specific purpose for this, we will share selected personal information with our offices in the country. This typically applies only to people who are closely associated with DACAAR, who are visiting or are involved in solving tasks in the country, for example, professional resource persons, board members, consultants, employees and the like.

8.2 If we share your personal information with recipients located outside of the EU / EEA most likely our local offices in Afghanistan or relevant partner organisations, this will be done in accordance with Article 49 (1) of the Data Protection Regulation and either be a necessary act in connection with drawing up a contract between DACAAR and you or another party, or be an act based on your prior explicit consent.

9 DELETING YOUR PERSONAL INFORMATION

9.1 As an organisation, we are obliged to limit the amount of personal data we collect and store, and we have fixed procedures for deleting such information. We keep your personal information in accordance with the following rules:

9.2 Contact information and similar common personal data collected and used in connection with handling ongoing cases, including public inquiries about our activities, are stored as long as the case is in progress and for a subsequent period of up to 1 year. However, general personal information about contact persons with authorities, organisations, and companies that DACAAR

routinely or occasionally communicates with, for example, consultants and journalists, is stored for as long as this is relevant for DACAAR's work.

9.3 Looking for a job at DACAAR, we will save your application and the supporting documents for a period of up to 6 months. If we wish to save your application, etc. for a longer period of time, we will ask for your consent to do so. Such consent may be revoked at any time.

9.4 Relevant personal data, which DACAAR is required to store in accordance with the Accounting Act, including payment information, contracts, etc., is stored in the current year + 5 years. If we are required to store personal data for an extended period of time, we will do this in accordance to other relevant legislation, or in order to enforce any applicable law.

9.5 Relevant personal data contained in correspondence, reports or other written material relevant to the implementation of DACAAR's ongoing program activities and partnerships in Afghanistan, or for the development of new program phases or partnerships, will be stored in the + 5 year cooperation period.

9.6 Name, title and other general personal data of DACAAR's board members and auditors will appear in various accounts and minutes, and will be retained indefinitely.

9.7 Personal data, including photo and video material contained in DACAAR's articles and other communications materials, are stored for an indefinite period. If you have given your consent to us using your personal information, this consent may be revoked at any time.

10 YOUR RIGHTS

10.1 Information: We have a duty to inform you of what personal information we collect about you, what the purpose of this is, how your information is used, what authority we have to process your information, who we share it with, how long they saved etc. This is done through, among other things, this policy, but also through our direct communication with you.

10.2 Insight: You have the right to gain insight into the personal information we process about you. By contacting us, you may request insights into the personal information we have registered about you, including the purposes for which the information is collected. We will comply with your request of insight as soon as possible and within the applicable deadline.

10.3 Correction: You are entitled to request a correction or supplementary processing of the personal information we process about you. We will comply with your request as soon as possible, to the extent necessary. If we can't meet your request, we will contact you.

10.4 Deletion: You have the right to request deletion or blocking of the personal information we process about you (the right to be forgotten). We will comply with your request as soon as possible, to the extent necessary. If we can't meet your request, we will contact you.

10.5 Limitation of Treatment: You have - under special circumstances - the right to have limited processing of your personal information. Please contact us, if you wish to restrict the processing of your personal information.

10.6 Data Portability: You have the right to receive your personal information (information about yourself as you yourself provided) in a structured, commonly used and machine-readable format (data portability). Please contact us if you want to take advantage of data portability.

10.7 Right of Cancellation: You have the right to ask us not to process your personal data, in cases where the processing is based on Article 6 (1) of the Data Protection Regulation. 1 (f) (legitimate interest) .If you are in doubt as to whether this applies, feel free to contact us. You can exercise the right of objection at any time by contacting us.

10.8 Revocation of Consent: If the processing of your personal information is based on your consent, you are entitled to withdraw your consent at any time. However, your withdrawal does not affect the legality of the treatment that was carried out before withdrawing your consent. Please contact us if you wish to revoke your consent.

10.9 There may be conditions or restrictions related to the exercise of the above rights. You may not, for example, be entitled to data portability in the particular case - it depends on the particular circumstances of the processing activity.

10.10 If you wish to make use of one or more of the above rights, please contact us as stated in section 2.2 above (see page 1).

11 POSSIBLE IMPLICATIONS IF NOT PROVIDING PERSONAL INFORMATION

11.1 If it is necessary for us to get personal information from you, for instance, in order to enter into a contract or to provide a service to you that you request, it will appear where we collect the information. If you do not wish to provide the personal information we request, it may result in us being unable to conclude the relevant contract with you or provide the service that you request.

12 SAFETY

12.1 We put great emphasis on protecting your personal information and ensuring that handling of these at all times is conducted in a safe and reliable manner. We do that by controlling physical access to our office and by ensuring that only a few relevant employees have access to handle

your personal information and by conducting relevant risk assessments and complying with the provisions of our IT security policy.

12.2 In case of a breach of data security, we are obliged to report this to the Data Inspectorate, unless the violation of personal data security is unlikely to endanger the rights or freedoms of a natural person. However, if such a breach poses a high risk, we are also required to notify you if your personal data is involved.

13 COMPLAINTS

13.1 If you are unhappy with our handling of your personal information, you may complain to the appropriate public authority in Denmark, which is:

Datatilsynet

Borgergade 28, 5th floor

1300 Copenhagen K.

Phone +45 3319 3200

E-mail: dt@datatilsynet.dk

14 UPDATE OF THIS POLICY

14.1 DACAAR is required to comply with the basic principles of protection of personal information and data protection. Therefore, we regularly review this policy to keep it updated and in accordance with applicable principles and laws. This policy is subject to change without notice. Significant changes to the policy will be published on our website along with an updated version of the policy.

This policy was last updated December, 2018

This is a translation of the Danish version of our Private Policy at <http://dacaar.org/dk/funktion/om-os/#privacy>. If there are discrepancies between the two versions, the Danish one is applicable.