

## PRIVACY NOTICE FOR VOLUNTEERS

This privacy notice („**Notice**“) explains how Heateo Sihtasutus (“**we**” or “**us**”) processes your personal data when you register to volunteer and participate in the volunteering programme.

1. **Controller.** The controller of your personal data, who determines the means and purposes of the processing, is Heateo Sihtasutus, registry code 90008175. In case of personal data protection related inquiries, please contact us by writing to [info@heategu.ee](mailto:info@heategu.ee).
2. **Categories and sources of personal data.** We may obtain and process the following categories of personal data:
  - 2.1. If you register to volunteer, we may process the following personal data: your name, e-mail address, contents of your LinkedIn profile or other relevant profile showing your skills and/or experience, phone number, skills, topic(s) you are interested in, how many hours you think you can help, purpose of signing up as a volunteer, expectations for us, information on where you found out about us (“**Basic Data**”);
  - 2.2. If you participate in the volunteering programme, we may process the following personal data: your name, e-mail address, phone number, information about volunteering (including location, time, tasks, feedback) (“**Volunteering Data**”);
  - 2.3. If you interact communicate with us, we may process the following personal data: e-mail address, phone number, date, time and contents of your message (“**Communication Data**”);
  - 2.4. We may photograph and film you, the volunteering activities and events, therefore we may process your image, which we create during the volunteering or events (“**Image Data**”).

We may obtain your personal data directly from you or create it during the volunteering relationship (e.g., Image Data).

If you do not provide the required information, we may not be able to contact you, or you may not be able to volunteer or we may not be able to fulfil any other purposes provided in Section 3 of this Notice.

3. **Legal basis and purposes for processing personal data.** The legal basis and purposes for processing your personal data depends on the objective and context in which we obtain your personal data. The following depicts a descriptive list of processing purposes that are linked to the specific data categories and legal basis for processing:

Processing purpose	Legal basis	Categories of personal data
Registering your interest in being a volunteer; inserting your data to our volunteering database; finding suitable volunteering opportunities for you; responding to your enquiries about volunteering	Taking and implementing pre-contractual measures	Basic Data Communication Data
Concluding volunteering agreement; providing suitable volunteering opportunities; responding to your enquiries about volunteering	Performing a contract	Volunteering Data Communication Data
Managing general administration regarding the volunteering; asking for	Our legitimate interests in providing a volunteering programme, analysing and	Basic Data

your feedback regarding the volunteering; improving our volunteering programme, including marketing, relationships and experiences	improving the quality of our volunteering programme and marketing strategy	Volunteering Data Communication Data
Sending out newsletters	Consent	Basic Data
Photographing and filming you, the volunteering and events	Our legitimate interests in capturing the event and storing memories	Image Data
Posting images to our social media channels	Consent	
Administering given and withdrawn consents	Our legitimate interest in ensuring valid legal basis and recording given and withdrawn consents	Basic Data
Operating video surveillance cameras	Our legitimate interests in maintaining the security of our office, preventing and investigating crime	Security Data
Complying with legal or regulatory obligations or requests	Performance of legal obligations	All data categories, as applicable
Establishing, exercising, or defending legal claims, whether in court proceedings or in an administrative or out-of-court procedure in relation to our or our employees' rights	Our legitimate interest in managing legal claims, facilitating effective establishment, exercise, or defence of legal claims	

We may process your personal data for other purposes, provided that we disclose the purposes and use to you at the relevant time, and that you either consent to the proposed use of the personal data, other legal grounds exist for the new processing purposes, or the new purpose is compatible with the original purpose brought out above.

4. **Recipients of personal data and data transfers.** In processing of personal data, we may disclose your personal data to the recipients in the following categories:
  - 4.1. public sector authorities, supervisory and law enforcement authorities to fulfil our statutory obligation, a court order, to establish, exercise or defend our legal rights or in other cases where this is necessary to prevent and deter unlawful acts. The legal basis is performance of our legal obligations or our legitimate interest in facilitating effective establishment, exercise, or defence of legal claims.
  - 4.2. professional advisors to ensure our proper economic activity, including seek financial and legal advice and to establish, exercise or defend our legal rights. The legal basis is seeking financial and legal advice and managing legal claims, including facilitating effective establishment, exercise, or defence of legal claims.
  - 4.3. service providers to help us in providing the volunteering programme. The legal basis is our legitimate interest in providing the volunteering programme.
  - 4.4. our legal successors and/or potential acquirers, if necessary and required for transferring the foundation or for the purposes of merger and/or acquisition. The legal basis is our legitimate interest in facilitating proper due diligence process and business continuity by ensuring a successful merger, acquisition or restructuring of the foundation.

We have concluded with all processors engaged in the processing of personal data on our behalf written data processing agreements. For service providers located outside the European Union or the European Economic Area (“**EU/EEA**”), we use safeguards (e.g., standard contractual clauses approved by the European Commission) to ensure that a level of protection of personal data comparable to that applicable in the EU/EEA is applied to your personal data. Upon your request we will make available further information on the safeguards applied.

- 5. Personal data retention periods.** We will store your personal data as long as reasonably necessary to attain the objectives stated in Section 3 of this Notice, or until the legal obligation stipulates that we do so. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the processing purposes and whether we can achieve these purposes through other means, and applicable statutory obligations. Whilst retaining the personal data, we take into account the need to resolve disputes and enforce the contract between us or anonymize your personal data and retain this anonymized information indefinitely.

Following the retention period or if we no longer need the respective personal data for the purposes specified in Section 3 of this Notice, we shall destroy the respective personal data within a reasonable time, unless the retention of personal data is required to perform duties or fulfil requirements arising from the legislation or to protect against ongoing or threatened disputes.

- 6. Your rights as a data subject.** You may, at any time, exercise the following rights with respect to our processing of your personal data: obtain confirmation that we process your personal data and request access to your personal data; request that we correct any of your inaccurate personal data; object to certain processing of your personal data; request that we restrict the processing of your personal data; request that we erase your personal data; request that we provide your personal data in structured, commonly used and machine-readable format and transmit it to another controller; or in cases where the processing is based on your consent, you have the right to withdraw your consent to such processing at any time.

To learn more about the above rights or exercise them, please contact us as specified in Section 1 of this Notice. If you are not satisfied with our response to your request in relation to personal data processing or you believe we are processing your personal data not in accordance with the law, you can submit your claim to the data protection authority, in Estonia the Estonian Data Protection Inspectorate (in Estonian *Andmekaitse Inspektsioon*) at [info@aki.ee](mailto:info@aki.ee) (<https://www.aki.ee/>).

- 7. Changes to this notice.** This Notice may be amended or modified from time to time to reflect the changes in the way we process personal data, and in such case, the most recent version of the Notice will be published on this webpage. Please check back periodically, and especially before you provide any new personal data.

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