

Non-profit association governed by the law of July 1, 1901 Headquarters: 23, rue d'Anjou – 75008 PARIS SIRET No.: 5310805390020 RNA: W751202247

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#### PERSONNAL DATA PROTECTION POLICY

#### 1/ **PURPOSE**

This "Policy" sets out the principles on which any personal information collected from you or about you will be processed by LP4Y.

It only applies to personal data of natural persons.

#### 2/ **PRINCIPLE**

LP4Y is committed to respecting and protecting the confidentiality of the personal information of its members, donors, sponsors, philanthropists, volunteers, volunteers, partners, and the Young Adults it supports.

#### 3/ PERSONNAL DATA PROCESSED BY LP4Y

LP4Y only collects, processes, and uses data that is necessary for its activities. It does not sell its data, engage in any profiling, or install cookies or trackers.

The data collected varies depending on the nature of your relationship with LP4Y.

#### In general

#### Identification and contact information

(mainly name, surname, title, date of birth, nationality, postal and email address, phone number(s))

#### And (except for the Young Adults that LP4Y supports)

# **Banking and transactional information**

(bank account details, information related to donations, subscriptions, and other contributions received by LP4Y.)

# > For Volunteers and, if applicable, for the Young Adults supported by LP4Y (if available and existing):

## **Family situation**

(mainly marital status, number and age of children)

#### **Essential heath data**

(for Volunteers, health certificate allowing long-term expatriation without known pre-existing health issues—vaccinations)

**Training or employment information** 

(mainly type and level of education, type and level of employment, employer(s), and for Volunteers: sending organization and contractual framework of the assignment)

#### Administrative information

(mainly copies of identity card, passport, driver's license)

#### • Financial information

(Allowances [\*] paid to Volunteers and "LP4Y Money" [\*\*] paid to Young Adults supported by LP4Y)

#### • Tax information

(mainly country of residence, tax status)

#### • Insurance information

(mainly covered risks and insurance companies or brokers)

## 4/ COLLECTION METHOD USED

LP4Y collects directly from you the data it processes and uses, through the completion of membership and/or donation forms, and for Volunteers and Young Adults it supports, mainly through responses to questionnaires, contract signing, submission of medical certificates, or communication of administrative documents or information provided by training and sending organizations.

# 5/ PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

## • Compliance with legal or regulatory obligations

Compliance with obligations related to issuing tax receipts

Completion of legal formalities for publicity (Administrators)

Fight against money laundering and the financing of terrorism

Responding to official requests from authorized public or judicial authorities

Respect for your decisions regarding designated donations and related accounting requirements

- Execution of contracts with sending organizations and Volunteers
- Execution of LP4Y's humanitarian commitments

Creation of Centers

**Development of Programs** 

Trainings, sending, and monitoring of Volunteers on filed missions (Insurance coverage – Medical follow-up – Payment of allowances – Coverage of travel expenses...)

Reception and follow-up of the Young Adults supported by LP4Y (Training – Payment of allowances – Coverage of travail expenses...)

## • Service of LP4Y's legitimate interests

Development and implementation of the educational project, either directly or in partnership with local partners

IT management, directly or through outsourcing, of relationship with stakeholders and accounting Diffusion of information about LP4Y's activities (Newsletters – Facebook – or orhters)

Sending invitations to information meetings and general assemblies

Subscription and updating of insurance (Volunteers – Administrators – Young Adults supported by LP4Y) through a specialized broker.

## 6/ ENTITIES TO WHICH THE DATA MAY BE DISCLOSED

LP4Y communicates personal data collected :

- Solely for the purpose of fulfilling the aforementioned objectives
- And only:
  - o To other entities within the LP4Y Alliance
  - To subcontracted service providers performing tasks on its behalf

- To certain individuals acting at its request and belonging to regulated professions, such as auditors, and possibly lawyers or notaries
- Possibly to financial, judicial, or public authorities upon request and within the limits permitted by applicable regulations..

#### 7/ TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

It is limited to the processing of specific operations by LP4Y ALLIANCE in the country where the relevant transversal service is established.

- If the European Commission has issued an adequacy decision recognizing that the country ensures a level of personal data protection equivalent to that provided by the applicable regulations in the European Economic Area, the data is transferred on this basis.
- Otherwise, LP4Y will implement appropriate safeguards in accordance with Article 46 of the GDPR.

## 8/ DATA RETENTION PERIOD

The collected data will be retained for the periods specified in the table below, established considering the associated risks, applicable legislation, and relevant statutory limitation periods.

Data subject	Retention period
Members	3 years after the last membership fee payment
Donors	7 years after the issuance of the last tax receipt
Prospects	3 years after the last contact
Volunteers	<b>20</b> years after the end of the mission, provided no claims are made against LP4Y. This period may be <b>extended</b> until a final decision or the expiration of third-party rights in case of legal action.
Benevolent workers	3 years after ceasing all active contribution to LP4Y
Applicants	3 years after the first interview
Youths (Beneficiaries)	25 years after permanently leaving the LP4Y Center (LPC). This period may be extended in cases where local statutes of limitations exceed those applicable in France or are nonexistent in the relevant country.
Archived Records	Retained indefinitely but with restricted content, processing, and access delegation.

## 9/ YOUR RIGHT AND HOW TO EXERCISE THEM

In accordance with the applicable regulations, you have the following rights concerning your personal data:

## Right of access

You may request a copy of your data or information about how it is being processed

#### > Right of rectification

If you believe it is inaccurate or incomplete

## > Right to withdraw consent

At any time

## > Right to erasure

Within the limits allowed by the applicable regulations

#### > Right to restriction of processing

You may request the limitation of the processing of your data

## > Right to object

for reasons related to your particular situation, including the processing for commercial prospecting or profiling purposes. It is important to note that LP4Y:

- Does not sell its data files
- Does not engage in profiling
- Does not use cookies or trackers

#### > Right to data portability

par demande de restitution des données que vous avez fournies, ou de transfert de celles-ci à un tiers lorsque cela est techniquement possible.

You can exercise these rights:

- By postal mail to LP4Y Attention of DPDP 23, rue d'Anjou 75008 Paris
- Or by email to dpdp@lp4y.org

You also have the

#### Right to file a complaint with supervisory authorities

By contacting the CNIL directly - - 3, Place de Fontenoy - 75007 Paris

# 10/ INFORMATION ON CHANGES TO THE PROTECTION POLICY

Technological advancements and regulatory changes may lead LP4Y to periodically update its **Personal Data Protection Policy**.

You will be informed of any significant changes by notification on its websites or through communication during its information meetings or General Assemblies.

## 11/ CONTACT US

For any questions regarding the use of your personal data, please contact the Data Protection Officer.

# [\*] "Allowances"

Small amounts paid monthly to Volunteers to help them cover their basic living expenses.

## [\*\*] "LP4Y Money"

An amount paid by LP4Y to the Young Adults it supports, progressively increasing based on their progress in the training program, but always below the local minimum wage to encourage them to engage in professional life once the LP4Y program is completed.