



Privacy and Personal Data Protection Policy

CORPORATE DOCUMENT

Crown Agents Ukraine LLC

Issued by: **Crown Agents Ukraine LLC** Version: **1.0** Date: **2026** Kyiv, Ukraine

CHANGE LOG

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Crown Agents Ukraine respects the privacy of individuals who interact with the Company through this website, and processes personal data in accordance with the Law of Ukraine “On Personal Data Protection” of 1 June 2010 No. 2297-VI.

1. Data Controller

The data controller is Crown Agents Ukraine LLC (EDRPOU 42999001), registered at: 32/2 Knyaziv Ostrozkykh Street, Kyiv, 01010, Ukraine.

Questions regarding the protection of personal data can be sent to tenderbox@crownagents.com.ua.

2. Who This Policy Applies To

This policy applies to the processing of personal data of:

- website visitors;
- individuals who complete contact forms on the site;
- newsletter subscribers;
- job applicants;
- donor and partner representatives;
- suppliers;
- tender participants;
- consultants and other individuals who interact with Crown Agents Ukraine through the site.

3. What Data We Collect and From What Sources

Depending on how a person interacts with the site, we may collect:



Contact data (name, email address, phone number, organisation name) — provided directly by the individual through a contact form, subscription form, or event registration form.

Job applicant data (CV, cover letter, contact details, professional experience) — provided directly by the applicant when submitting an application.

Tender participant and supplier data (registration documents, price proposals, Business Partner Questionnaire and supporting documentation) — provided by the supplier in the course of a tender procedure.

Correspondence content with users of the site.

Technical data — IP address, browser type, website access logs, collected automatically when the site is visited.

Analytics data — de-identified or aggregated information about site usage, which may be collected by web analytics services to improve the site's performance and usability.

4. Purposes of Processing and Legal Bases

We process personal data only for specific purposes and solely on the legal bases provided by law:

Responding to enquiries submitted through the contact form — legal basis: the Company's legitimate interest in communicating with interested parties, and, where relevant, taking steps at the data subject's request prior to entering into a contract.

Sending newsletters and updates — legal basis: the subscriber's consent, which may be withdrawn at any time.

Event registration — legal basis: taking steps at the data subject's request prior to entering into a contract, or the Company's legitimate interest in organising a specific event.

Reviewing a job application — legal basis: taking steps at the applicant's request prior to entering into an employment contract.

Reviewing a tender bid or supplier documents — legal basis: taking steps prior to entering into a contract, performance of contractual obligations, and fulfilment of a legal obligation to report to donors.

Technical data and access logs — legal basis: the Company's legitimate interest in ensuring the security and proper functioning of the site.

Analytics and site improvement — legal basis: the Company's legitimate interest in analysing site usage and improving its functionality and usability.

We do not use a single, one-size-fits-all consent statement for every type of processing — each action on the site is accompanied by its own short privacy notice, linked to this policy, explaining the specific legal basis that applies to that particular form.

5. Who We Share Data With

Personal data may be shared with partner organisations or other parties involved in project implementation, as well as with technical service providers who support the operation of the site, including web analytics services, with donors and clients — to the extent necessary for project reporting, and with government authorities where required by law. Any such sharing is carried out solely in the manner established by the legislation of Ukraine and the relevant contracts.

Where personal data is transferred outside Ukraine, we ensure that protection safeguards equivalent to the requirements of Ukrainian personal data protection legislation are applied.



6. Retention Periods

We retain personal data for no longer than necessary to achieve the purpose of processing, in accordance with the principle established by the Law of Ukraine “On Personal Data Protection”:

Data from contact forms and correspondence — for the period necessary to address the enquiry, and no longer than required by the purpose of processing.

Newsletter subscriber data — until consent is withdrawn (unsubscribed).

Job applicant data — for the duration of the recruitment process; after its conclusion, the data is deleted or anonymised unless the applicant has given separate consent to retention in a talent pool.

Tender documentation and supplier documents — in accordance with the periods established by Crown Agents Ukraine's Procurement Policy and the requirements of the relevant donor, including a seven-year retention period after contract completion for audit purposes.

Technical access logs — for the minimum period necessary to ensure the security and functioning of the site.

7. Rights of the Data Subject

In accordance with Article 8 of the Law of Ukraine “On Personal Data Protection”, every individual has the right to:

- know the sources of collection, the location of their personal data, the purpose of its processing, and the persons to whom that data is disclosed;
- access their personal data;
- request correction of inaccurate or incomplete data;
- request erasure of personal data or restriction of its processing where legal grounds exist;
- withdraw consent to the processing of data at any time, where processing was based on consent;
- lodge a complaint regarding the processing of their personal data with the Ukrainian Parliament Commissioner for Human Rights, who exercises state oversight of compliance with personal data protection legislation.

To exercise these rights, please contact tenderbox@crownagents.com.ua.

8. Data Protection

Crown Agents Ukraine implements organisational and technical measures to protect personal data against accidental loss, unlawful processing, and unauthorised access, in accordance with the requirements of the Law of Ukraine “On Personal Data Protection”. For security reasons, this policy does not disclose details of technical architecture or specific access control measures.

9. Updates to This Policy

We may periodically update this policy, including in connection with changes in legislation or data processing practices. The date of the last review is indicated on this page.

Effective date: 2026. Date of last review: 2026.