

**DATA PROTECTION INFORMATION
FOR APPLICANTS AND PARTICIPANTS IN THE PROGRAM
“THRIVE AFGHANISTAN”**

(Information on data protection regarding our processing of personal data
according to Art. 13, 14 and 21 of the General Data Protection Regulation (GDPR))

Dear applicant,

You may want to apply to participate as a learner in the “THRIVE Afghanistan” Program (“Program” or “THRIVE Afghanistan Program”). In accordance with the requirements of Art. 13, 14 and 21 of the General Data Protection Regulation (“GDPR”), we hereby inform you about the processing of your personal data and your related data protection rights. In order to ensure that you are fully informed about the handling and processing of your personal data when you apply to participate in the Program, please take note of the following information. If your application is successful and you become a learner of the Program, you will also register as a learner on Kiron Campus. For your activity on Campus, the [Campus privacy policy](#) will apply. This information sheet shall be understood as complementary information to the information of the [Campus privacy policy](#), to inform you of specific processes concerning your personal data as a learner of the Program.

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1. GENERAL INFORMATION

In this chapter you find general information about our company as a data processor and about the processing and handling of your data and the purpose and legal basis of the processing. In the following chapters we provide you more detailed information about specific processes and about your rights.

a. RESPONSIBLE INSTANCE UNDER DATA PROTECTION LAW

Responsible for the processing of your data under GDPR is:

Kiron Open Higher Education gGmbH
% Impact Hub Berlin
Rollbergstr. 28A
12053 Berlin, Germany
privacy@kiron.ngo
www.kiron.ngo

b. CONTACT INFORMATION OF OUR DATA PROTECTION OFFICER

You can contact our data protection officer as follows:

PROLIANCE GmbH
Leopoldstr. 21
80802 Munich, Germany
datenschutzbeauftragter@datenschutzexperte.de
www.datenschutzexperte.de

c. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

We process your personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG), insofar as this is necessary to enable you to apply for and to participate in the "THRIVE AFGHANISTAN" Program.

Furthermore, we may process your personal data if this is necessary for the compliance with legal obligations (Art. 6 para. 1 lit. c GDPR) or for the defense and assertion of legal claims arising from the application for the Program as well as by its implementation, to the extent Kiron is the data processor. The legal basis for the latter is Art. 6 para. 1 lit. f GDPR. The legitimate interest is, for example, a burden of proof in the context of legal proceedings.

If you give us your express consent to process personal data for specific purposes (e.g. to keep your contact for a longer period of time), the lawfulness of this processing is given on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR. You may withdraw your consent at any time with future effect (see chapter 4 of this data protection information).

d. CATEGORIES OF PERSONAL DATA

The personal data processed includes a.o. name, age, gender, e-mail address, location data (country of origin, current country of residence), data about education and professional experience, language knowledge, employment status, as well as additional data that you may decide to share in the course of the Program.

e. SOURCE OF DATA

On the one hand, we process personal data that you provide with the application for the Program through the recruitment form or in the course of the application process.

We may also view and process data that are published on your profile on the social media platform LinkedIn, if you wish to share your profile with us and /or as far as your profile is made available to the public and/or to recruiters.

Further data may be collected when you register for and participate in additional activities (webinars, live events, coaching/mentoring).

f. RECIPIENTS OF DATA

We only pass on your personal data within our company to those areas and persons who need this data to fulfill contractual and legal obligations or to implement our legitimate interest.

Service providers and vicarious agents engaged by us may also receive data for these purposes if they require the data to perform their respective services. These are, for example, providers of IT services and software. All service providers are contractually obliged to treat your data confidentially. More information about this follows in this information sheet.

Your personal data is processed on our behalf on the basis of contract processing agreements in accordance with Art. 28 of the GDPR. In these cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR. The categories of recipients in this case are IT and software service providers (e.g. Google Workspace), providers of communication solutions, video conferencing solutions (e.g. Zoom).

Other data recipients may be those entities for which you have given us your consent to transfer data or to which we are authorized to transfer personal data on the basis of a balancing of interests.

Specifically, we are cooperating with the company The Liaison Office ("TLO") based in Kabul, Afghanistan, which will support us during the recruitment process and will be in charge or will support us to carry out certain activities of the Program. To this purpose TLO will have access to some of your personal data, like name, age, attendance, email address, professional qualifications. TLO may also collect some personal data directly from you, that TLO may also share with us. TLO has committed to maintain confidentiality and data protection. We have also entered into data protection agreements with TLO concerning the processing of your data.

Furthermore we might share personal data with third parties that will be engaged to carry out certain activities of the Program (e.g. teachers, mentors and coaches). In these cases we will share only your personal data which is essential for carrying out

the specific activity, e.g. your name, your qualifications that are relevant for the specific activity (e.g. language knowledge for English lessons), e-mail address if necessary to stay in contact.

Otherwise, data is only passed on to recipients outside the company if this is permitted or required by law, or if we have your consent.

If links to other websites are placed on our website or are shared with you otherwise for certain services, we have no influence nor control on the content of such websites and the way they process personal data. We recommend that you read the respective privacy notices to obtain information on how your personal data is collected and processed.

g. TRANSFER TO A THIRD COUNTRY

Data is transferred to bodies in countries outside the European Economic Area (so-called third countries) insofar as

- it is required by law (e.g. reporting obligations under tax law)
- you have given us your consent or
- this is legitimized by the legitimate interest under data protection law and does not conflict with any higher interests of the data subject worthy of protection.

Beyond this, we do not transfer any personal data to bodies in third countries or international organizations, other than to TLO or coaches, mentors etc. based in Afghanistan, as described above in sub-para f.

However, for certain tasks, we use service providers (e.g. Google) who may have their registered office, parent company or data centers in a third country, or who may use sub-service providers who may have their registered office, parent company or data centers in a third country. A transfer is permitted if the European Commission has decided that an adequate level of protection exists in a third country (Art. 45 GDPR). If the European Commission has not taken such a decision, the companies or the service provider may only transfer personal data to service providers in a third country if appropriate safeguards are provided (standard data protection clauses adopted by the EU Commission or the supervisory authority in a specific procedure) and enforceable rights and effective legal remedies are available.

We have also contractually agreed with our service providers that data protection guarantees must always be in place with their contractual partners in compliance with the European level of data protection. We will provide you with a copy of these guarantees on request.

h. DURATION OF THE STORAGE OF DATA

We store your personal data for as long as this is necessary for the decision on your application. In case your application will not be successful, your personal data or application documents will be deleted no later than four months after the end of the application process (e.g. the announcement of the rejection decision), unless longer storage is legally required or permitted. We only store your personal data beyond this if this is required by law or in a specific case for the assertion, exercise or defense of legal claims for the duration of a legal dispute.

In the event that you have consented to a longer storage of your personal data, we will store it in accordance with your declaration of consent.

If you are accepted into the Program following the application process, your data will continue to be stored in our space on Google Drive at least for the duration of the Program and afterwards to the extent necessary and permissible under the applicable laws or to the extent necessary to fulfill the requirements of donors and funders of the Program.

With respect to the duration of the storage of your data on Campus, the privacy policy of Kiron Campus will apply www.kiron.ngo/privacy-policy.

2. RECRUITMENT FORM

For the recruitment form Kiron uses a Google form that is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Using this service Google's terms of service (<https://www.google.com/intl/en/policies/terms/>) and privacy policy (<https://www.google.com/policies/privacy/>) will apply.

All information and data that you will input in the Google form is processed automatically by Google in one of their secure data centers. We have concluded a data processing agreement with Google. Through the use of Google Forms, personal data may be transferred to the USA. Google (Google LLC) is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards, which can be viewed at the following link:

<https://www.dataprivacyframework.gov/s/applicant-search>

For potential transfers to other third countries outside the EU and the EEA for which there is no adequacy decision by the EU Commission, the provider states that it uses standard data protection clauses in accordance with Art. 46 para. 2 lit. (c) lit. c GDPR. These oblige the recipient of the data in the third country to process the data in accordance with the level of protection in Europe, see here:

<https://policies.google.com/privacy?hl=de&gl=de>

For further information see:

<https://apps.google.com/faq/security/> and

<https://cloud.google.com/security/whitepaper>

3. REGISTRATION AND PARTICIPATION IN THE PROGRAM

If you are selected to participate in the Program following the application process, you will be requested to register on Kiron Campus. For your activity on Campus, the privacy policy of Kiron Campus will apply www.kiron.ngo/privacy-policy. Please review carefully this policy to be informed and understand how your data is processed e.g. when you attend courses provided by external providers (e.g. Coursera, LinkedIn, Lingua TV).

Third Parties Course Providers

As a Program learner you will be granted access to different free online courses, which may be offered by the external partners. E.g. English courses may be offered by **Lingua TV** or a local school, other courses may be offered by Coursera or LinkedIn ("External Partners"). You can access these courses through links that you will receive from us or that you will find on Campus.

When the courses are offered by External Partners, you are directed to the External Partner's platform or website, where in order to access the selected courses, you will either login with your Program participant account or you will have to open a new account. Such websites and platforms are governed by their own separate privacy policies and terms of services, which you will have to accept in order to be able to use the services they offer. We recommend that you read carefully the information that the External Partners provide about the data collected by websites, how such data is processed, the purpose and legal basis of processing, your rights and other relevant data related information is specified in the respective privacy policies and terms of service.

Kiron may also receive information about the users and their activities (e.g. participation and completion of courses and programs, test results, etc.) on and off the service from the External Partners.

The processing of this information is necessary for the purposes of the legitimate interests in accordance with art. 6 para. 1 s. 1 lit. (f) GDPR.

Mentoring

Kiron may offer the learners mentoring and coaching services, through external service providers. The attendance will be voluntary. If you decide to attend, personal data will have to be shared with the mentors and coaches, e.g. name, e-mail address, and if relevant for the service, data about professional qualifications and education, with the purpose to confirm your identity and to enable effective mentoring/coaching.

E-Mail Account

We will ask you to set up an e-mail account dedicated to the Program. You may choose the e-mail provider of your choice, including Gmail. The use of this e-mail account will be governed by the terms of service and the privacy policy of the e-mail provider.

Group Works

Furthermore for certain tasks and activities we will ask you to join selected shared drives that are hosted on our GoogleDrive. The access will be granted to you using the e-mail account you will choose for the Program. For Google Drive we use the services provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. For more details about this s. Section 2 of this Data Protection Information Sheet.

The access to these shared drives will be limited to Kiron's employees in charge of moderating the specific activity of the Program and to the Program participants involved in the relevant task.

4. COMMUNICATION WITH APPLICANTS AND LEARNERS

Gmail

Before and during the application process and once learners have been accepted as learners of the Program Kiron will use e-mail as the main communication channel. Our kiron.ngo e-mail address is maintained by **Google Ireland Limited**, Gordon House, Barrow Street, Dublin 4, Ireland ("Google") and administered by Kiron as part of Google-for-Nonprofits program. All information and data you choose to share with us by E-mail is processed automatically by Google in one of their secure data centers. We have concluded a data processing agreement with Google Workplace. Through the use of Google Workplace, personal data may be transferred to the USA. Google (Google LLC) is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards, which can be viewed at the following link: <https://www.dataprivacyframework.gov/s/applicant-search>.

For potential transfers to other third countries outside the EU and the EEA for which there is no adequacy decision by the EU Commission, the provider states that it uses standard data protection clauses in accordance with Art. 46 para. 2 lit. (c) lit. c GDPR. These oblige the recipient of the data in the third country to process the data in accordance with the level of protection in Europe, see here:

<https://policies.google.com/privacy?hl=de&gl=de>

Mailjet

Furthermore we may use the services of Mailjet SAS, a technical service provider to whom we pass on the email address you provide when you have applied. This forwarding is carried out in accordance with Art. 6 para. 1 s. 1 lit. (f) GDPR and serves our legitimate interest in the use of an effective, secure and user-friendly communication. Your email address will be stored on servers located in the EU.

We have concluded a data processing contract with **Mailjet SAS**, 13-13 bis, rue de l'Aubrac, 75012 Paris, France

More information: <https://www.mailjet.com/privacy-policy/>

Communication via the messaging service Telegram

Kiron may offer to keep in contact with you or send you updated information via the messaging service Telegram for organisational purposes, e.g. to create and coordinate participant groups, or to share and coordinate live and digital events. It will be your own decision whether you want to use Telegram for purposes of the Program, and to join any of the Program groups on Telegram and which of your devices you will use for Telegram. In case you decide to do so, you will have to access the service as a user; the terms of use and the privacy policy of Telegram will apply.

You can find more information:

<https://telegram.org/faq>

<https://telegram.org/privacy>

Videoconferencing Tools

In the event that we will invite you to an online interview in the context of the application process, or for webinars that are part of the Program we may use one of the following video conferencing services from the following service providers:

Zoom Inc.

Personal data will be processed by Zoom Inc. when users access their services.

More information: https://explore.zoom.us/en/privacy/?_ga=2.59340653.1133822383.1710770402-1506998994.1701867925

Google Meet, a service by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

More information:

https://support.google.com/meet/answer/10400210?hl=en&ref_topic=14074547&sjid=1603810317046323182-EU

GoogleMeet is part of the services of GoogleWorkspace. We have concluded a data processing agreement for Google Workplace with Google Ireland Limited.

The legal basis for this is Art. 6 para. 1 (f) GDPR. The legitimate interest is our interest to use effective and reliable communication channels with applicants and learners, to carry out the selection process or webinars in an effective and secure way.

Campus Community

You will also have the possibility to communicate with other learners using the communication tools of Campus. In this respect we recommend reviewing carefully [Campus privacy policy](#).

5. YOUR RIGHTS

Every data subject has the right to request information in accordance with Art. 15 GDPR, the right to request correction in accordance with Art. 16 GDPR, the right to request deletion in accordance with Art. 17 GDPR, the right to request restriction in accordance with Art. 18 GDPR, the right to receive notification in accordance with Art. 19 GDPR as well as the right to receive personal data in accordance with Art. 20 GDPR.

Furthermore you have the right to lodge a complaint with a data protection supervisory authority in accordance with Art. 77 GDPR if you are of the opinion that the processing of your personal data is not in accordance with the law. The right of appeal exists regardless of any other administrative or judicial remedy.

If the processing of data is based on your consent, you are entitled to withdraw your consent to the use of your personal data at any time in accordance with Art. 7 GDPR. Please note that the revocation only takes effect for the future. This does not affect processing that took place before the withdrawal. Please also note that we may have to retain certain data for a certain period of time in order to comply with legal requirements (see section 8 of this data protection information).

RIGHT OF APPEAL

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 Sect. 1 lit. f GDPR, you have the right to object to the processing of your personal data at any time, in accordance with Art. 21 GDPR, in case there are reasons for that, which result from your special situation. We will then no longer process your personal data unless we can account for compelling reasons for the processing. Such reasons must outweigh your rights, interests and freedoms or the processing must be used for the assertion, exercise or defense of legal claims.

To protect your rights, you can contact us using the contact details given in section 1.

6. NECESSITY OF PROVIDING PERSONAL DATA

The provision of your personal data in the context of the establishment and performance of the volunteer activity is freely given. However, we can only work with you as a volunteer if you provide personal data that is required to establish and perform the volunteer activity.

7. PROFILING

We do not process your data with the aim of automatically evaluating certain personal aspects.

8. AUTOMATED DECISION-MAKING

The decision on your application is not based exclusively on automated processing. Therefore, there is no automated decision in individual cases within the meaning of Art. 22 GDPR.

9. CHANGES

If we make changes to this Data Protection Information Sheet that we believe materially impact the privacy of your personal information, we will promptly provide notice of any such changes (and, where necessary, obtain consent), as well as post the updated information on the application form noting the effective date of any changes.