

*Last updated: 19 May 2025*

## Who We Are

The Ukraine War Archive (UWA) is a UK-registered non-profit (Company No. 16044305) operating a digital platform that collects, preserves, and shares evidence of international crimes and human rights violations stemming from the war in Ukraine.

## What Information We Collect

- **Personal Data (Direct/Indirect):** Names, contact details, access logs, IP addresses, and metadata linked to users' interaction with materials.
- **Verification Data:** Information submitted through the Access Request form to establish user credentials and affiliation.
- **Platform Usage Data:** Metadata on access attempts, downloads, and viewing behaviors (in compliance with audit trail requirements).
- **Special Category Data:** May be encountered through evidence materials, handled under strict access control and with legal basis under Art. 9 GDPR and equivalent Ukrainian legislation.

## How We Use Your Information

- To verify, authorize, and assign Access Levels.
- To ensure platform security, data integrity, and legal compliance.
- To support legal, educational, and historical research within a controlled environment.
- To fulfill legal obligations (e.g., under Binding Legal Requests).

## Legal Basis for Processing

- **Legitimate Interests:** In preserving historical and evidentiary records and facilitating justice.
- **Consent:** Where users voluntarily provide information via forms or contact the Archive.
- **Legal Obligation:** Compliance with UK GDPR, EU GDPR, and Ukrainian Law.

## Data Sharing

- UWA does not sell or commercially exploit personal data.
- Data may be shared with international courts or legal bodies under secure protocols and subject to chain of custody compliance.
- In urgent or legally compelled scenarios (e.g. court orders), UWA may disclose material per Clause 3.8 of the Contributor Agreement .

- Processing activities may be supported by authorised data processors acting under written agreements that ensure compliance with applicable data protection laws, including Infoscope Ltd. as the platform infrastructure partner.
- We implement technical and organisational measures to protect personal data against unauthorised access, accidental loss, destruction, or alteration

## **Data Transfers**

- Transfers to the UK, EU, and other jurisdictions are governed by Standard Contractual Clauses (SCCs) or equivalent mechanisms .

## **Data Retention**

- Retained as long as necessary for evidentiary, archival, or public interest research purposes.
- Anonymisation/pseudonymisation applies where possible to minimize privacy impact.

## **Your Rights**

You may:

- Request access to your personal data.
- Request erasure or restriction (subject to legal limitations).
- Object to processing.
- File a complaint with the UK ICO or your local supervisory authority.

## **Contact**

For any questions or requests regarding your personal data and privacy, please contact us at:

**Email:** [privacy@ukrainewararchive.org](mailto:privacy@ukrainewararchive.org)

**Postal address:** Ukraine War Archive, 7 Bell Yard, London, England, WC2A 2JR

We're committed to safeguarding your privacy and ensuring transparency in everything we do.

## ***Updates to this policy***

*From time to time, we may update this Privacy Policy to reflect changes in the law or improvements in how we protect your data. We encourage you to check this page periodically. The latest version will always be published here, with the "Last updated" date.*