THE WORLD
ORGANIZATION OF
WOMEN NATIONS
WOMAFREESM INC.

US 501(c)(3) Public Charity | EIN: 98-1867647
Florida Not For Profit Corporation
FL Doc. No.: N25000005813

7901 4th St N, Ste 300
St. Petersburg, FL 33702, USA

PRIVACY POLICY

The World Organization of Women Nations Womafreesm Inc.

Privacy & Data Protection
Effective Date: May 28, 2026

This Privacy Policy is written in plain language. Where Womafreesm conducts research or operates in non-English-speaking regions, this Policy and all consent materials are made available in the principal languages of those populations. In the event of any conflict, the English version is the controlling version unless local law requires otherwise.

1. Introduction

Womafreesm respects your privacy and is committed to protecting your personal data, safety, and dignity.

This Privacy Policy explains:

- what information we collect;
- why we collect it;
- the lawful basis for each use;
- how we use, share, and protect it;
- how long we keep it;
- your rights regarding your personal data;
- how participation in Womafreesm operates under a privacy-first model.

Womafreesm operates under the principle of Private-by-Default. Participation does not require public visibility, and any public mention occurs only with your explicit consent.

This Policy is designed to support compliance with applicable privacy and data protection laws, including the EU General Data Protection Regulation (GDPR), the UK GDPR and Data Protection Act 2018, the California Consumer Privacy Act as amended by the CPRA (CCPA/CPRA), the Florida Digital Bill of Rights, and other applicable international data protection laws.

2. Data Controller

For the purposes of applicable privacy laws, including the GDPR and UK GDPR, The World Organization of Women Nations Womafreesm Inc. acts as the Data Controller for personal data collected through:

- websites;
- membership programs;
- volunteer programs;
- research initiatives;
- fundraising activities;
- communication channels;

- partnership programs.

3. Privacy & Data Protection Contact

Womafreesm has a Privacy & Data Protection Team responsible for receiving privacy-related enquiries, data subject requests, and questions about this Policy.

You may contact us regarding any matter relating to your personal data or this Policy at:

Privacy & Data Protection Team

The World Organization of Women Nations Womafreesm Inc.

7901 4th St N, Ste 300

St. Petersburg, FL 33702

United States

Email: info@womafreesm.com

As Womafreesm expands its research and international operations, we periodically review whether additional privacy governance roles, representatives, or contacts are required under applicable law. Where legally required, this Policy will be updated accordingly.

4. International Privacy Governance

Womafreesm is established in the United States and may process personal data relating to individuals located in different countries, including the United States, the United Kingdom, Ukraine, Germany, Poland, Spain, and other jurisdictions.

We aim to apply privacy-by-design and data minimization principles across our activities. Where local data protection laws require additional safeguards, notices, consent forms, local contacts, representatives, or other compliance measures, Womafreesm will assess and implement them as appropriate.

5. Who We Are

Womafreesm is an international nonprofit organization focused on:

- Evidence Data, including the Women's Life-Cycle Economy Index;
- Legal Rapid Response initiatives;
- international infrastructure for women's participation and advocacy.

Our mission includes research, education, coordination, advocacy, infrastructure development, and public-interest initiatives supporting women worldwide.

Womafreesm is non-partisan and does not support or oppose political parties, political candidates, or election campaigns.

6. What Information We Collect

Depending on your interaction with Womafreesm, we may collect:

A. Basic Information

- Name;
- email address;
- country or region;
- language preference;

- membership or participation status.

B. Participation Information

For membership and volunteer activities, we may collect submitted tasks, communication records, participation history, contribution records, and activity logs.

For research participation, we may collect survey responses, demographic information, analytical data, and sensitive personal information only where a lawful basis applies and, where required, with separate explicit consent.

C. Donation and Payment Information

Payments are processed through third-party payment providers. Womafreesm does not store complete payment card details on its own servers.

D. Technical Information

We may automatically collect IP address, browser type, device information, website usage information, cookies, and analytics data. Womafreesm follows the principle of data minimization and collects only information necessary for defined and legitimate purposes.

6.1 Information Collected From Third Parties

In some cases, particularly through Legal Rapid Response activities, we may receive personal data about an individual from someone other than that individual. For example, a case may be reported by a representative, a partner organization, or a third party acting on a person's behalf.

Where we obtain personal data indirectly, we will, within a reasonable period and no later than one month where required by law:

- inform the individual of the source of the data and the categories of data held;
- provide the relevant information about purposes, lawful basis, retention, and rights;
- unless doing so is impossible, would involve disproportionate effort, or would prejudice the safety of the individual or the purpose of the processing.

Where an exemption is relied upon, Womafreesm will apply appropriate safeguards and document the reason.

7. Lawful Basis and Purposes of Processing

The World Organization of Women Nations Womafreesm Inc. processes personal data only where a lawful basis exists under applicable data protection laws.

The table below explains the principal purposes for which we process personal data, the legal basis relied upon, and the categories of personal data generally involved.

Processing Activity	Purpose	Lawful Basis	Categories of Personal Data
Membership administration	Managing membership applications, records and member services	Performance of a contract; Legitimate interests	Name, email address, country, membership status
Volunteer management	Coordinating volunteer activities and contributions	Performance of a contract; Legitimate interests	Contact details, participation records, activity history

Processing Activity	Purpose	Lawful Basis	Categories of Personal Data
Research participation	Conducting public-interest research, surveys and statistical analysis	Consent; where applicable Article 9(2)(a) and/or Article 9(2)(j) GDPR	Survey responses, demographic information, research data, special-category data where applicable
Legal Rapid Response	Assessing, coordinating and managing requests for legal assistance	Consent; protection of vital interests where applicable; Legitimate interests	Contact information, case information, supporting documents
Donations and memberships	Processing donations, recurring memberships and financial records	Performance of a contract; Legal obligation	Identity information, donation history, transaction records
Communications	Sending operational updates, service announcements and responses to enquiries	Legitimate interests; Consent where required	Contact information, communication history
Website security	Maintaining security, preventing fraud, abuse and cyber threats	Legitimate interests	IP address, device information, security logs
Financial compliance	AML, sanctions screening, fraud prevention and regulatory compliance	Legal obligation; Legitimate interests	Identity information, payment records, transaction information
Publication of research	Publishing anonymised or aggregated research findings	Consent where applicable; Legitimate interests	Aggregated or anonymised research data
Compliance with legal obligations	Meeting legal, accounting, regulatory and reporting obligations	Legal obligation	Information required by applicable law

7.1 Categories of Personal Data and Retention

The following table provides a general overview of the principal categories of personal data processed by The World Organization of Women Nations Womafreesm Inc., their primary purpose, typical retention period, and whether they may include special-category data.

Category of Personal Data	Primary Purpose	Typical Retention Period	Special Category Data
Contact information	Communication and account administration	Up to 3 years after the last interaction	No
Membership records	Membership administration	Up to 7 years	No

Category of Personal Data	Primary Purpose	Typical Retention Period	Special Category Data
Volunteer records	Volunteer management	Up to 3 years after inactivity	No
Donation and financial records	Financial compliance and accounting	Up to 7 years	No
Communication records	Responding to enquiries and operational communications	Up to 3 years	No
Research responses	Statistical analysis, scientific and public-interest research	As required for research integrity and applicable law	May include special-category data
Legal Rapid Response records	Case assessment and coordination	Determined by legal and operational requirements	Yes
Technical and security logs	Security monitoring, fraud prevention and system integrity	In accordance with operational security requirements	No
Anonymised research datasets	Statistical analysis, scientific research and longitudinal studies	May be retained indefinitely	No (anonymised data is no longer personal data)

7.2 Our Legitimate Interests

Where The World Organization of Women Nations Womafreesm Inc. relies on legitimate interests as a lawful basis for processing, those interests may include:

- protecting the security, integrity and availability of our systems and services;
- preventing fraud, abuse, sanctions violations and other unlawful activities;
- safeguarding research participants, volunteers, donors and beneficiaries;
- administering membership, volunteer and partnership activities;
- improving our services, infrastructure and research methodologies;
- ensuring the proper governance and accountability of the organization;
- advancing our charitable, educational and public-interest mission.

Where required by applicable law, The World Organization of Women Nations Womafreesm Inc. conducts a Legitimate Interests Assessment (LIA) to ensure that these interests are not overridden by the rights and freedoms of data subjects.

7.3 Withdrawing Consent

Where processing is based on consent, you may withdraw your consent at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal became effective.

Where consent is withdrawn, The World Organization of Women Nations Womafreesm Inc. will cease processing the relevant personal data unless another lawful basis permits or requires continued processing.

7.4 Independence of Research

The World Organization of Women Nations Womafreesm Inc. does not sell personal data.

The World Organization of Women Nations Womafreesm Inc. does not permit donors, sponsors, governments, corporations, partner organizations, grant providers, or any other third parties to influence:

- research methodology;
- data collection methods;
- statistical analysis;
- interpretation of findings;
- publication of results;
- policy recommendations.

All research activities are conducted independently and in accordance with the organization's ethical principles, applicable law, and research governance standards.

8. Sensitive Data and Data Protection Impact Assessments

Certain activities, particularly research participation and requests for legal support, may involve sensitive or special-category personal information. This may include information relating to health, ethnicity, religious or philosophical beliefs, political opinions, sexual life, experiences of violence, or other sensitive matters.

Sensitive data is processed only:

- where a lawful basis applies;
- with explicit consent where required;
- for clearly defined purposes;
- under strict access controls;
- in accordance with applicable data protection requirements.

Before undertaking processing likely to result in a high risk to individuals, including large-scale research or Legal Rapid Response activities, Womafreesm will conduct a Data Protection Impact Assessment where required by law and implement appropriate safeguards.

9. Automated Decision-Making and Profiling

Womafreesm does not make decisions producing legal effects, or similarly significant effects, about individuals based solely on automated processing, including profiling.

Where any automated processing is introduced in the future, we will update this Policy, identify a lawful basis, and provide required safeguards, including the right to human intervention where applicable.

10. How We Use Your Information

We use personal data only for the purposes and lawful bases described in this Policy.

We may use personal data to:

- provide membership and volunteer services;
- administer projects and research;
- process donations and memberships;

- communicate operational information;
- improve security and infrastructure;
- publish aggregated research findings;
- comply with legal obligations;
- prevent fraud, abuse, money laundering, sanctions violations, and security threats;
- support referrals, coordination, or escalation in Legal Rapid Response activities.

We do not sell personal data, and we do not allow third parties to influence research methodology, analysis, conclusions, or publications.

11. Public Visibility and Privacy Controls

Participation in Womafreesm is private by default.

Your name, image, story, testimonial, organization, participation status, or other identifying information will never be publicly published without your explicit opt-in consent.

You may:

- remain anonymous where possible;
- participate privately;
- request removal of public mentions;
- withdraw consent for public recognition at any time.

12. International Data Transfers

Because Womafreesm operates internationally, personal data may be transferred to and processed in countries outside your country of residence, including the United States.

Where we transfer personal data outside the EEA or the UK to a country not covered by an adequacy decision, we rely on appropriate safeguards where required by law. These may include:

- EU Standard Contractual Clauses for transfers from the EEA;
- the UK International Data Transfer Agreement or UK Addendum to the SCCs for transfers from the UK;
- transfer risk assessments;
- supplementary technical and organizational measures where necessary;
- reliance on an adequacy decision where one applies.

You may request information about relevant safeguards by contacting the Privacy & Data Protection Team.

13. Data Retention

Personal data is retained only for as long as necessary to fulfill legitimate operational, legal, financial, research, and public-interest purposes.

Typical retention periods may include:

- membership records: up to 7 years;
- donation records: up to 7 years;
- financial records: up to 7 years;
- volunteer records: up to 3 years after inactivity;

- communication records: up to 3 years;
- research datasets: retained only for as long as necessary for research integrity, longitudinal analysis, legal compliance, and ethical accountability.

Where it is not possible to state a fixed retention period in advance, we determine the retention period using the following criteria:

- the purpose for which the data was collected;
- any legal, regulatory, tax, or accounting obligation to retain it;
- the existence of any actual or anticipated dispute or legal claim;
- the sensitivity of the data;
- the risk to the individual;
- whether the data can be anonymized.

Research data that has been irreversibly anonymized is no longer personal data and may be retained indefinitely for research and statistical purposes. Research data that is pseudonymized remains personal data and is subject to applicable retention rules, security measures, and rights.

Individuals may request deletion of personal data unless retention is required by law or justified by another lawful basis.

14. Security Measures

Womafreesm applies organizational and technical safeguards, including:

- restricted-access systems;
- encrypted communications where appropriate;
- role-based access controls;
- sanctions screening;
- fraud prevention procedures;
- incident response procedures;
- monitoring against impersonation and misinformation.

Given the heightened risks associated with Legal Rapid Response activities, case-related personal data is subject to additional access restrictions and handling controls.

15. Data Breach Response

In the event of a personal data breach, Womafreesm will:

- investigate and contain the incident;
- mitigate risks where possible;
- notify the relevant supervisory authority where required by law;
- notify affected individuals where required by law;
- maintain an internal record of breaches and actions taken.

Where GDPR or UK GDPR applies, Womafreesm will notify the relevant supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of a breach where the breach is likely to result in a risk to individuals' rights and freedoms.

16. Financial Crime, Sanctions Screening and Identity Verification

To comply with applicable laws and protect donors, beneficiaries, partners, and the integrity of the organization, we may process personal data to verify identity and screen donations, partnerships, grants, and financial transactions against sanctions lists.

These may include lists issued by OFAC in the United States, the European Union, the United Kingdom, and other relevant authorities. Where appropriate, we may request additional information for these purposes. The lawful basis for this processing is compliance with legal obligations and our legitimate interests in preventing fraud, money laundering, sanctions violations, and other financial crime.

17. Children's Privacy

Womafreesm does not knowingly collect personal information from children without an appropriate legal basis and safeguards. Under GDPR and UK GDPR, where we rely on consent to offer an online service directly to a child, we require the child to be at least 16, unless the relevant country has set a lower age permitted by law. In the UK, the age is 13.

Under US law, including COPPA, we do not knowingly collect personal information from children under 13 without verifiable parental consent.

Additional protections apply to research, educational, or advocacy activities involving minors, including enhanced consent procedures, data minimization, safeguarding review, and DPIA review where required.

Where we become aware that we have collected a child's data without an appropriate basis, we will delete it promptly.

18. Third-Party Service Providers

Womafreesm may use third-party providers for:

- payment processing;
- cloud infrastructure;
- communications;
- email delivery;
- analytics;
- forms and surveys;
- research tools;
- security services.

These providers process personal data on our behalf under written agreements that require them to protect personal data and process it only on our instructions, consistent with applicable law.

19. Cookies and Analytics

Womafreesm uses cookies and similar technologies to:

- improve website functionality;
- remember user preferences;
- maintain security;
- understand website usage and engagement.

We obtain your consent before placing non-essential cookies, including analytics and marketing cookies, on your device where required by law.

Strictly necessary cookies, required for the site to function, do not require consent.

You can manage your preferences at any time through our cookie banner and your browser settings.

20. Your Rights

Depending on your jurisdiction, you may have the right to:

- access your personal data;
- correct inaccurate information;
- request deletion;
- restrict processing;
- object to certain processing activities;
- withdraw consent;
- request data portability;
- lodge a complaint with a supervisory authority.

You may exercise these rights by contacting:

Privacy & Data Protection Team

Email: info@womafreesm.com

We will respond within the timeframe required by applicable law. Under GDPR and UK GDPR, we generally respond within one month of receiving your request. This period may be extended by up to two further months for complex or numerous requests, in which case we will inform you within the first month.

We may need to verify your identity before acting on a request.

If you believe we have not handled your data properly, you may lodge a complaint with your local supervisory authority. These may include:

- United Kingdom: Information Commissioner's Office;
- European Union: the Data Protection Authority in your country of residence, workplace, or the place of the alleged infringement;
- United States, California: California Privacy Protection Agency or Office of the Attorney General.

We would appreciate the opportunity to address your concerns directly before you approach a regulator.

21. California Privacy Rights

If you are a California resident, you may have specific rights regarding your personal information, including:

- the right to know what categories of personal information we collect and the purposes for which it is used;
- the right to access your personal information;
- the right to delete your personal information;
- the right to correct inaccurate personal information;
- the right to opt out of the sale or sharing of personal information.

Womafreesm does not sell or share personal information as those terms are defined under the CCPA/CPRA.

We do not discriminate against individuals for exercising their privacy rights.

California residents may submit requests via info@womafreesm.com. We will verify your request and respond within the timeframes required by law. Authorized agents may submit requests on your behalf with appropriate authorization.

Florida residents may have additional rights under the Florida Digital Bill of Rights. Where it applies to our activities, we honor applicable rights of access, correction, deletion, and opt-out.

22. Your Rights in Other Regions

Womafreesm operates across many countries. Where local data protection law grants you additional rights not listed in this Policy, we will honor those rights to the extent they apply.

This may include rights under laws applicable in Ukraine, Germany, Poland, Spain, the United Kingdom, the European Union, the United States, and other jurisdictions where Womafreesm conducts activities.

23. Legal Support Disclaimer

Womafreesm is not a law firm and does not directly provide legal representation.

Legal support activities may involve referrals, coordination, escalation, education, or assistance through qualified legal professionals, partner organizations, or pro bono networks.

24. Changes to This Policy

Womafreesm may update this Privacy Policy periodically.

Material changes may be communicated through the website, email notifications, or official Womafreesm communication channels. The latest version of this Policy will be posted on the Womafreesm website.

25. Contact Information

Privacy & Data Protection Team

The World Organization of Women Nations Womafreesm Inc.

7901 4th St N, Ste 300

St. Petersburg, FL 33702

United States

Email: info@womafreesm.com

Website: https://womafreesm.com

26. Core Privacy Principles

Womafreesm operates according to the following principles:

- Private-by-default participation;
- explicit opt-in visibility;

- data minimization;
- transparency and accountability;
- non-partisan governance;
- human dignity and safety;
- no sale of personal data;
- evidence-based systems with ethical protections;
- privacy-by-design in research and public-interest activities.