

## Privacy Notice

### 1. General

- This Privacy Notice explains why Give Foundation (**we** or **us** or **our**) collects information, how that information may be used, processed, protected, and otherwise handled when You use, or visit our website (**Platform**).
- This Privacy Notice applies to any person or entity (**You** and **Your**) that accesses the Platform or has shared any information or data with us. It covers all personal data (**PD**) that can be used directly or indirectly to identify You.

**THE PRIVACY NOTICE IS AN INTEGRAL PART OF THE [TERMS AND CONDITIONS](#).**

**YOU HAVE BEEN DIRECTED TO THIS PAGE TO FAMILIARIZE WITH THE TERMS AS WELL AS PROVIDE INFORMED CONSENT. WITHOUT CONSENTING TO THE TERMS HEREIN, YOU CANNOT CONSENT TO THE TERMS AND CONDITIONS AND SHOULD NOT USE THE PLATFORM.**

**BEFORE YOU SUBMIT ANY INFORMATION TO US, PLEASE READ THIS PRIVACY NOTICE FOR AN EXPLANATION OF HOW WE WILL TREAT YOUR PERSONAL DATA.**

**IF YOU DO NOT AGREE WITH THIS PRIVACY NOTICE, PLEASE DO NOT USE THE PLATFORM.**

**WE RESERVE THE RIGHT TO UPDATE THE TERMS OF THIS POLICY AND SUCH CHANGES WILL BE POSTED ON THE PLATFORM.**

### 2. PD we collect

- We collect and process the PD provided by You when You access, browse and/or use our Platform.
- PD collected includes the following categories:
  - (i) basic identification information *like* name, address,
  - (ii) identification information *like* PAN number
  - (iii) contact information *like* phone, email address, contact address
  - (iv) financial and payment information *like* type payment type
  - (v) information about Your donation, including the campaign in which You are donating to and the amount of Your donation
  - (vi) information about fundraiser or campaign *like* campaign name, start date, Target amount, end date.
  - (vii) device and hardware information for syncing and seamless access
  - (viii) location information

information on how You use our Platform through our or third-party cookies such as duration for visiting or using Platform, how long You stayed on the Platform, items clicked, etc. **To know more about use of cookies, please review [Our cookie policy](#).**

- (ix) social media URLs such as Facebook, Twitter, YouTube, Instagram, LinkedIn and other social media profiles
- While using the Platform, You may be using services of third-parties. You understand, agree and acknowledge that the Platform never receives Your PD provided to the third-party. Your PD will be dealt by third-party in accordance with their respective privacy policies and other terms and conditions; and we shall not be liable, accountable or responsible for Your PD which You provide to the third-party.
- Whenever You use our Platform in case of an error, we collect data and information on Your device called Log Data. This Log Data may include information such as IP address, device name, operating system version, the time and date of Your use of the Platform, and other statistics.
- **While we shall make reasonable endeavors to ensure that Your PD is duly protected by undertaking security measures prescribed under applicable laws, You are strongly advised to exercise discretion while providing PD and using our Platform, given that the internet is susceptible to security breaches.**

### 3. How do we collect PD?

We collect PD:

- directly from You when you voluntarily provide Your PD while accessing, browsing or using any part of the Platform; and
- indirectly from other sources such as cookies, web beacons, website traffic, information available in public domain through internet searches, analytic studies and other information that we may derive while processing PD.
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### 4. How do we process PD?

- We collect, record, organize, structure, align, retrieve, adapt, access, review, archive, analyze, pseudonymize, encrypt, decrypt, profile, transfer, perform other related technological and manual processing activities.
- We process PD in accordance with fair, accountable and transparent processing principles as required under applicable law. Governing principles that we follow for processing are:
  - (i) process lawfully, fairly and with transparency
  - (ii) process only for purposes communicated, or those which are reasonably expected to be connected with the purposes, or for purposes which are compatible with them
  - (iii) minimize collection only as much is adequate, relevant and necessary
  - (iv) take reasonable steps to maintain accuracy in light of the processing purposes
  - (v) retain in such form bearing in mind the processing purposes

- (vi) use technical, operational, and organizational security measures
- (vii) prevent accidental loss, unlawful destruction, or access, or damage
- (viii) maintain confidentiality and integrity of PD, unless carved out in this Privacy Notice

- **Profiling:** Profiling means automated processing of PD to evaluate certain personal attributes about You. This aims at analyzing Your behavior while using the Platform. **There will be no profiling by automated means that will affect Your PD protection rights and privacy**

## 5. Why do we process PD?

We process PD for the following purposes:

- (i) to enter into a lawful contract with You
- (ii) to provide You with information on services offered by us
- (iii) registering You on the Platform
- (iv) communicating with You
- (v) respond to any queries You submit to us
- (vi) conducting market research, surveys, trend research, analytics to understand Your need for using the Platform, demand for services, updates, upgrades and software feature requirements
- (vii) administering and protecting our operations and this Platform
- (viii) creating, improving and developing our Platform
- (ix) obtaining feedbacks from You and acting thereupon
- (x) for donations, fundraisers and campaigns
- (xi) send You information such as receipts, certificates, upcoming events, newsletters, etc.
- (xii) protect and secure Your PD
- (xiii) detect and handle data breach scenarios
- (xiv) periodically review PD collected to adhere with Your requests regarding Your rights and legal obligations under applicable law
- (xv) maintaining secure personal information management system
- (xvi) archiving, statistics analysis, survey, R&D activities
- (xvii) manage our relationship with You
- (xviii) compliance with applicable law
- (xix) promotion, marketing and advertising
- (xx) sharing with third parties; more details about third party data transfer below.
- (xxi) honouring Your requests and rights
- (xxii) complying with contractual obligations
- (xxiii) defending or initiating legal, contractual and other equitable relief should such situation arise

**Our legal basis for processing PD for the above purposes is premised on the following:**

**For PD governed under EU GDPR and UK Data Protection Act's long-arm jurisdiction:** The abovementioned processing activities are pursuant to Article 6(1)(a) of EU General Data Protection Regulation (**EU GDPR**) your consent conferred through terms of use, Article 6(1)(b) of EU GDPR for performing contract with you or entering into a contract with you, Article 6(1)(c) of EU GDPR for compliance with legal obligation that we are subjected to, and Article 6(1)(f) of EU GDPR for our legitimate interests in performing our contractual obligations with You, complying with legal and statutory requirements, in such manner, so as not to override your interests or fundamental rights and freedoms regarding your PD.

**For PD otherwise:** The abovementioned processing activities are pursuant to your consent, lawful contract with us which is required for the Platform, compliance with applicable law and our legitimate interests.

## **6. How do we protect your PD?**

- We take the safety of Your PD and its confidentiality very seriously and are committed to providing reasonable security safeguards that commensurate to the sensitivity of the PD being handled, including but not limited to implementation of reasonable technical, operational and physical safeguards.
- All our staff, personnel, officers, representatives and members receive appropriate and on-going training to ensure they are fully aware of their obligation to uphold confidentiality, protect PD, respect Your privacy. Only limited authorized personnel and approved third parties have access to PD on a need-to-know basis and only for specific purposes.
- We require our partners and contractors to strictly adhere to applicable data protection laws, and additional requirements, so as to contractually obligate them to honour your privacy expectations vis-à-vis your PD.
- We follow data minimization and retention practices diligently and should you wish to learn more about our processes on how we secure PD, please write to us at [info](mailto:info)

## **7. How long do we store PD?**

We will store and process Your PD for such duration as is necessary in order to fulfill the purposes stated in this Privacy Notice and comply with applicable law. For instance, when You make donations and are provided with tax exemption certificates, we are required under law to preserve data for ten years under applicable taxation laws. Under all circumstances, it is our practice to follow data minimization and retain in a safe manner only for purposes already identified in this Privacy Notice.

Our overarching goal is not to retain PD in identifiable form longer than what is necessary, after which they will be destroyed.

## **8. Sharing Your PD To Third Parties**

- We do not sell, rent, or trade Your PD in any manner.
- We disclose PD on a strict need-to-know basis to our service providers, like hosting partners, cloud service providers, maintenance vendors who assist us in operating and maintaining the Platform, NGOs, and charities who are using donations for social impact and charitable activities. We may also disclose PD with advertising platforms and other similar service providers for availing promotional, advertising, market outreach and similar services.
- We may also disclose PD to other service providers if required for our operations including comply with law, enforce our policies, or protect ours or others' rights, property or safety, investigate fraud, or respond to a government request.

- In all such instances, we require the third-party to maintain confidentiality, use PD only for the limited purpose for which it is disclosed, and restrict onward transfer. We also insist that recipient destroys PD to the extent feasible once the purpose is achieved.
- Before transferring PD to a third party, we conduct reasonable due diligence factoring the purposes, such as evaluation of processes implemented, reserving audit and inspection rights, requiring representations, and mandating compliance with applicable laws concerning data protection and privacy from the third party. For processors, we require them to adhere to our privacy and data protection practices and policies as well. We also contractually require them to implement appropriate information security measures.

## 9. What are your rights?

- **For Users in EU/EEA:** Your rights are:

- (i) access- You can request a copy of the PD we are processing about You.
- (ii) rectify- You can rectify incomplete or inaccurate information that we process about You.
- (iii) erasure- You can request us to delete PD that we process about You.
- (iv) restrict processing- You have the right to restrict our processing of Your PD where You believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose.
- (v) portability- You can obtain PD we hold about You in a structured, electronic format, and transmit such data to another data controller.
- (vi) object- where the legal basis for processing Your information is our legitimate interest, You have the right to object to such processing on grounds relating to Your particular situation.
- (vii) withdraw consent- You have the right to withdraw Your consent consented to our processing of Your PD at any time.
- (viii) rights in relation to automated decision making and profiling-You have the right not to be subject to a decision, based solely on automated means if the decision produces legal effects concerning You or significantly affects You in a similar way.
- (ix) lodge complaint- You can file a complaint with the local data protection authority if You believe that we have not complied with applicable data protection laws.

- **For Users in United Kingdom:** Your rights are:

- (i) access
- (ii) rectify
- (iii) erasure
- (iv) restrict processing
- (v) portability
- (vi) object
- (vii) withdraw consent
- (viii) rights in relation to automated decision making and profiling
- (ix) lodge complaint to the Information Commissioner

- **For Users in California:** Your rights are:

- (i) notice- You have the right to be notified which categories of PD are being collected and the purposes for which the PD is being used.
- (ii) request- You have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes and sharing of PD.
- (iii) say no to the sale of PD (opt-out)- You have the right to direct us to not sell your PD.
- (iv) deletion- You have the right to request the deletion of Your PD, subject to certain exceptions.
- (v) not to be discriminated against- You have the right not to be discriminated against for exercising any of Your rights.

- **For all other Users:** Your rights are

- (i) access – seek confirmation on whether and what PD is processed and seek access.
  - (ii) lodge complaint – file a complaint with appropriate authority under applicable law.
  - (iii) correction - correct inaccurate or misleading PD, complete incomplete PD, update outdated PD, provided it is essential for the purposes of processing.
  - (iv) withdraw or modify consent - withdraw or modify consent at any time; this will not affect processing that has taken place prior to the date You request such withdrawal or modification. If withdrawal or modification will have a bearing on You accessing the Platform or availing Services, we will notify You before acting on Your request.
  - erasure - erase PD; if You exercise this right, it may be the scenario that this may have a bearing on using and accessing the Platform and we will notify You before acting on Your request
- You can exercise these rights by writing to us at [info@giveindia.org](mailto:info@giveindia.org). We will try our best to provide the necessary information within 30 days from receipt of the request. If requests are excessive or unfounded or repetitive at our sole discretion, we can refuse to Your request or charge a reasonable fee for costs, in which case You can choose to complaint to appropriate authority.

## 10. Our cookie policy

- We use cookies, web beacons, mobile identifiers, tracking URLs, log data or similar technologies to help provide, protect and improve the Platform. Cookies are small files transferred to the hard drive of Your device that enables us to recognize Your browser, capture and remember certain information. They are also used to help us understand Your preferences based on previous or current activity on the Platform, which allows us to improve our Platform and better tailor the experience to Your interests and needs.
- Cookies and similar technologies aid us to understand Your navigation pattern and interaction on the Platform, serve You tailored advertising, show You content that may be relevant to You, monitor and analyze the performance, operation and effectiveness of the Platform, and for purposes of support, analytics, research, service development and compliance with applicable law.
- We also use cookies and similar technologies to help us compile aggregated and anonymized data about the traffic on the Platform, so that we can offer better experiences and tools in the future.
- In many cases, the information collected through these technologies is processed in a non-identifiable manner, without reference to PD. However, in some cases, it may be associated with

the PD. Cookies and similar technology tools can either expire when You close Your browser, or continue to remain on Your device even after You close the browser.

- Please note that most browsers automatically accept cookies, and if You do not wish cookies to be used, You may need to actively delete or block the cookies. All browsers are different, and hence You must visit their “help” section to learn about cookie preference and other privacy settings. You can choose to reject or block all or specific types of cookies by clicking on the cookie preferences. For instance, [Internet Explorer](#), [Google Chrome](#), [Mozilla Firefox](#), or [Apple Safari](#). You can also manage the use of flash technologies, including cookies and local storage objects with the flash management tools available at [Adobe’s website](#).
- We may also use third-party services that track this information. We are not responsible for third-party cookies and other similar technologies that gets placed on the Platform. For example, to help us better understand how Users use our Platform, we work with a number of analytics partners, including Google Analytics. To prevent Google Analytics from using Your information for analytics, you may install the Google Analytics Opt-Out Browser by [clicking here](#). You must access your cookie settings to set Your preferences, or review their cookie policy to further understand the details.
- If you are accessing the Platform through a mobile device, You can also update your privacy settings on your device by setting the “Limit Ad Tracking” and Diagnostics and Usage setting property located in the settings screen of Your Apple device, or by resetting your Android ID through apps that are available in the Play Store. You can also limit information collection by uninstalling the app on your device and You can use the standard uninstall process available as part of Your device for this purpose.

If You receive tailored advertising on your device through a web browser, You can learn more about such tailored browser advertising and how you can generally control cookies from being put on Your device to deliver tailored advertising, by visiting the European Interactive Digital Advertising Alliance Consumer [Ad Choices link](#) for EU based advertising or for US based advertising either: (i) the Network Advertising Initiative’s Consumer [Opt-Out link](#) or (ii) the Digital Advertising Alliance’s Consumer [Opt-Out link](#) to opt-out of receiving tailored advertising from companies that participate in those programs. Please note that to the extent advertising technology is integrated into our Platform or other websites that You visit, You may still receive advertisements even if You opt-out. In that case, the advertising will not be tailored to Your interests. Also, we do not control any of the above opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices You make using these mechanisms or the continued availability or accuracy of these mechanisms.

## 11. Links to Other Sites

The Platform may contain links to other third-party websites or any third-party electronic communication services who may or may not collect PD about You. We do not directly provide any PD to such third-party websites. If you submit Your PD to any of those sites, Your information will be governed by their privacy statements. We encourage You to read the privacy statement of any

website You visit. We shall not be liable for any loss, damage, claim or expenses suffered by You as a result of accessing these third-party sites and features.

## **12. Contact**

If You have any questions, comments, rights request, or complaints, please contact us at [info@giveindia.org](mailto:info@giveindia.org)