## **B.11 DATA PROTECTION AND PRIVACY**

## 1. Objective

Concerns regarding personal data and its privacy hold an important place in organisational practices. Dakshin treats the subject of data privacy with seriousness and this policy endeavours to protect the personal data of individuals and organisations collected in the course of Dakshin's operations. The policy also lays down guidelines on how such data needs to be treated with care, respect and confidentiality in the course of Dakshin's operations.

### 2. Scope

This policy is restricted to personal data obtained by Dakshin staff authorised to do so, in the course of Dakshin's operations to facilitate such data collection and storage. Persons from whom such data might be collected include staff, consultants, research affiliates, adjuncts, advisors, interns and volunteers. It also includes personal information collected from partner organisations, community members and donors, including personal information collected by projects working with communities.

Such data might be obtained from staff, visitors to Dakshin's field stations and offices. Such information includes personal information contained in contracts, on forms (online and hard-copy), subscription forms, workshop registration lists, on websites, email communications etc, and may be disclosed wittingly or unwittingly to staff by persons.

No third parties may access personal information held by the organisation without having first entered into a confidentiality agreement after a discussion with the Director and the HR Dept.

# 3. Why is personal data collected at Dakshin?

Dakshin's operations require collection of personal data for multiple reasons including:

- a. the organised and systematic execution of its mandate;
- b. to fulfil legal obligations;
- c. to keep internal records of donors and supporters as part of fundraising activities;
- d. to communicate information about Dakshin's achievements and its activities to members of the wider public who are interested in our work;
- e. to fulfil contractual obligations of grantors, donors or partners;
- f. to systematically perform certain charitable environmental preservation-related actions such as conducting trainings, workshops, meetings and networking actions;

### 4. Steps to ensure data privacy

Dakshin is committed to making sure all personal information is held safely, as per prevailing data protection laws. Dakshin staff collecting such information must ensure the following:

- a. When collecting personal data from individuals, Dakshin staff must make clear to them which data is being collected, is necessary and for what purpose it is being used.
- b. Should recipients wish to unsubscribe from email lists, e-groups, newsletters and other communication material sent via email or post by Dakshin staff, the latter is obliged to remove them from such lists.

- c. Persons interacting with Dakshin in any of the above-mentioned capacities (see pt. 2. Scope) can request a copy of their personal info maintained at Dakshin by contacting us at the email address provided in the contact us section on our website.
- d. Dakshin staff shall not trade or sell personal information with any organisations or companies.
- e. 'Sensitive data' pertaining to health, income and other items of enquiry related to humans, collected by staff from the wider public as part of research activities, shall require prior approval from Dakshin's Research Ethics Committee.
- f. Staff collecting any personal data shall be responsible for carefully storing such data on secure computers, portable storage devices (such as pen drives and hard disks) or cloud platforms and shall ensure that such data does not lie unprotected and open for all to view.

### 5. Donor data and its privacy at Dakshin

Dakshin may collect personal information from individual and organisational donors and grantors for the purposes of processing payments and communicating with them about Dakshin as well as conducting fundraising and related operations. This 'donor data' may include name, amount donated, address, telephone number, donor comments, email address, signature, photographs, PAN number, passport information and any other personal information provided to us by the said donor. For donations by check, donor data also includes the data visible on the check.

- a. Dakshin will not release or make use of any donor information (individual or organisations) for any other purpose without the consent of the said donor.
- b. Dakshin offers donors the option to be recognised anonymously.
- c. Dakshin shall not track, collect or distribute personal information entered by those who visit our websites without their permission.
- d. Donors can request Dakshin to make reasonable efforts to delete certain personal information, unless we are legally mandated to maintain such records.
- e. Dakshin's staff will need to consult the Director before sharing the personal email addresses or phone numbers of any of our donors. Such sharing may take place after permission has been obtained from the donor.
- f. Donor data may be shared with government agencies only if legally mandated by prevailing Indian laws.

## 6. Information collected by third party Payment Processors and Other Service Providers

Payment processors allow donors to donate electronically using a payment services account, a credit card, or any other payment method. These processors collect certain information from donors. It is the donor's responsibility to consult their privacy policies to determine their practices before using their services. Dakshin does not accept liability for practices of such service providers.

#### 7. Cookies

Dakshin's websites and social media platforms collect cookies only through third party sites such as Word Press, Facebook, etc. to enable greater functionality. For example, if any of our content embeds photos and video content from websites such as YouTube or Facebook, such sites may set a cookie when visitors click on such content. The Dakshin website hosts embedded 'share' buttons which allow visitors of the site to share content from the website using social

media such as Facebook, Twitter or Instagram. These sites may also deploy cookies when users log into their services. Dakshin does not control the dissemination of these cookies and takes no liability for actions resulting from the same.