

# DATA PROTECTION AND PRIVACY

## 1. Objective

Andamans Conservancy Foundation (ACF) regards matters relating to personal data and privacy with utmost importance and seriousness. To this end, ACF's data protection and privacy policy outlines the nature of the data that is collected and the measures taken by the organisation to protect the personal data of individuals and entities collected during ACF's operations.

## 2. Scope

This policy is applicable to obtain personal offline and online by our staff during our operations to facilitate transparent data collection and secure storage. "Staff" includes consultants, research affiliates, advisors, interns and volunteers. It also includes personal information collected from partner organisations, community members and donors.

Personal data might be obtained from staff, project teams at ACF's field stations and offices, and includes information provided for contracts, forms (online and hard copy), workshop registration lists, websites, email communications etc. Non-sensitive personal data refers to phone numbers, addresses etc. Sensitive personal data refers to data such as passwords, bank details, PAN, Aadhaar, employment benefits-related data, medical records and biometric information.

No third parties will have access to sensitive personal information held by the organisation without prior informed consent and only after entering into a confidentiality agreement following a discussion with the Executive Director and the HR department.

## 3. Why is personal data collected at ACF?

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

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

## 4. Steps to ensure data privacy

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

When collecting sensitive personal data, we will ensure that the concerned individuals have

knowledge about what data is being collected, why it is necessary and the purposes for which it will be used.

Should one wish to unsubscribe from email lists, e-groups, newsletters and other communication material sent via email or post by ACF staff, ACF is obliged to remove them from such lists. Persons interacting with ACF in any of the above-mentioned capacities (see pt. 2. Scope) can request a copy of their sensitive personal information that is kept on record by emailing us at [info@andamansconservancy.org](mailto:info@andamansconservancy.org).

ACF staff will not trade or sell personal information with any organisation(s) or individual(s). Any sensitive personal data pertaining to health, income and other items of enquiry collected by staff as part of research activities is collected only after prior approval from ACF's Programme Heads and is deemed important for the project.

ACF will take responsibility for carefully storing sensitive personal data and will guide its staff on data security concerns periodically.

## **5. Donor data and its privacy at ACF**

ACF may collect personal information from donors and grantors for the purposes of processing payments, communication as well as legal compliance. 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 donor.

For donations by check, donor data also includes the data visible on the cheque.

- a. ACF will not release or make use of donor information (individual or organisations) for any other purpose without the consent of said donor.
- b. ACF offers donors the option to be recognised anonymously.
- c. ACF will not track, collect or distribute personal information entered by those who visit our websites without their permission.
- d. Donors can request ACF to make reasonable efforts to delete certain personal information, unless we are legally mandated to maintain such records.
- e. 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. ACF does not accept liability for practices of such service providers.

## **7. Cookies, Tracking and Analytics**

ACF'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 ACF website hosts embedded 'share' buttons that 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.

ACF does not control the dissemination of these cookies and takes no liability for actions resulting from the same.