# **Data Privacy Policy**

#### **OBJECTIVE**

We at Piramal Foundation, value you as a beneficiary/user of our website and we respect your right to privacy. PF is committed to ensure the privacy of the information shared by you with us. This policy sets out how PF uses and protects the information you provide. The policy is subject to changes from time to time; hence, we request you to go through the policy each time you access the site.

### **DEFINITIONS**

I. Personally Identifiable Information (PII) Personally Identifiable Information" (PII) means any information that relates to a natural person, which either directly or indirectly, in combination with other information available or likely to be available with PF, is capable of identifying such person. Some examples of PII are Name, Date of birth, Gender, Bank account or credit card number, etc.

II. Sensitive Personal Data or Information (SPDI) "Sensitive personal data or information" (SPDI) of a person means such personal information, which consists of information relating to: Passwords, Financial information such as Bank account or credit card or debit card or other payment instrument details, Physical, physiological, and mental health condition, Sexual orientation, Medical records & history, Biometric information, Aadhaar and PAN details, Any details relating to the above clauses as provided to body corporate for providing services. Any of the information received under the above clauses by body corporate for processing, stored or processed under lawful contract or otherwise. Provided that, any information that is freely available or accessible in public domain or furnished under any law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this policy. PF does not, in any form collect any data from a minor (below 18 years of age) as our beneficiaries are BPL women and if in case any SDPI or even PII of any minor is entered we shall delete such data as soon we get the intimation by email or by competent authority. We may collect the data of the children of our beneficiaries for our health and education program, only in cases where the beneficiary/lawful guardian has consented only for these services.

# **APPLICABILITY OF THE POLICY**

- 1. This policy is defined at the Organization level, and as such, shall be customized and then enforced by individual businesses in their own unique legal and regulatory environments.
- The PIRAMAL FOUNDATION shall enforce statements in this policy document over information systems that they directly own and are responsible for and shall provision/ distribute this policy as guidance for all Subsidiaries
  - a PIRAMAL FOUNDATION FOR EDUCATION LEADERSHIP
  - b KAIVALYA EDUCATION FOUNDATION
  - c PIRAMAL SWASTHYA MANAGEMENT RESEARCH INSTITUTE

This Policy is applicable to all the personal information and sensitive personal data, or information collected by PF or its affiliates directly from the beneficiary or through PF's online portals, mobile apps, and electronic communications and any information collected by PF from the beneficiary's browser.

#### **ACCURACY**

PF shall have processes in place to ensure that the personal information residing with PF is complete, accurate and current. If at any point of time, there is a reason to believe that personal information residing with PF is incorrect, the beneficiary may inform PF in this regard. PF shall correct the erroneous information as quickly as possible.

# **WHY DO WE COLLECT**

We require this information to understand your details, financial details and provide you our services without any hinderances and for: Internal record keeping purposes, Compliance with the regulatory requirements as per the different laws and regulations Contact purposes for due reminders, overdue reminders, policy reminder notices, claims processing, etc. Using the information for conducting surveys, market research purposes. Contacting you by phone, mobile, e-mail or fax.

#### **DISCLOSURE OF INFORMATION**

Subject to the other terms contained herein, we will not disclose your personal information to any third parties or affiliates for their promotional purposes, unless acting under good faith that such action is necessary to: Conform to any statutory or legal requirements or comply with legal process or judicial orders. Protect, enforce, and defend our rights or property. Protect our interests or interests of PIRAMAL FOUNDATION Group Companies. The Beneficiary authorizes PF to share all the information related to the details and transaction history of the Beneficiaries to its affiliates / banks / financial institutions / credit bureaus / agencies / customary practices, credit reporting, statistical analysis and verification or risk management and shall not hold PF liable for use or disclosure of such information. For the fulfilment of the regulatory requirements PF will treat beneficiary's personal information as private and confidential (even when the customer is no longer associated with us), and, as a general rule, not disclose such information to any other individual / institutions including its subsidiaries / associates, tie-up institutions etc. for any purpose unless: - The customer has authorized such disclosure explicitly in writing. Disclosure is compelled by law / regulation. We have a duty to the public to disclose, i.e. in public interest. We have to protect our interests through disclosure. With your consent, we may share your information with PIRAMAL FOUNDATION Group companies for offering their products/ services to you.

## **SECURITY PRACTICES AND PROCEDURES**

The security of personal information is a priority and is protected by maintaining physical, electronic, and procedural safeguards that meet with the requirements mentioned in the applicable laws. PF shall take reasonable steps and measures to protect the security of the beneficiary's personal information from all sorts of misuse and loss, un-authorized access, modification or disclosure. PF maintains its security systems to ensure that the personal information of the beneficiary is appropriately protected and follows the extant standard protection norms followed for the transmission of information.

### RETENTION OF PRIVATE DATA

We shall be holding your data in our systems as long as it is required for business purposes outlined in our privacy policy. However, regulatory requirements may require that the data be stored for an extended period. We shall dispose of your information using a secure destruction mechanism only.

#### **GRIEVANCE REDRESSAL**

While we will strive to ensure that you do not have any grievances, in case you have any concern or grievance, you may address the same at dpo@piramalfoundation.org. You may also contact us by post at our registered address - Piramal Foundation,

# **NOTICE OF CHANGE**

Piramal Foundation may, from time to time, change/ update this, Policy.