

# ADC Website Privacy Policy

## About ADC

We are Piramal Foundation, having its registered office 2<sup>nd</sup> Floor, Piramal Ananta, Piramal Agastya Corporate Park, LBS Marg, Kurla West, Mumbai 400070, India (hereinafter “ADC”, “we” or “us”).

## 1. Applicability of our Privacy Statement

This Privacy Statement applies to our public-facing ADC website and other online services and will be available by a link on all sites and services which it covers. We encourage you to take a moment to look at the applicable Privacy Policy / Privacy Statement, available by a link at the bottom of the homepage or as you download an application.

Our sites contain links to other websites which may or may not be owned by ADC and we do not control the content or privacy practices of those sites. (<https://adc-india.org/#>)

Our websites and offerings are directed to people in their business or professional capacities such as funding partners, beneficiaries, government partners – NITI Ayog, State governments and several strategic partners.

Please note, for purpose of this Online Privacy Statement, personal information means data or set of data that can identify an individual, such as name, address, telephone number, and email address.

## 2. Collection and Use of Personal Data

1. **Data collected through cookies and similar technologies** – *please note that based on local laws we might be required to obtain your prior consent (opt-in) or provide you with opt-out (right to object or to say no) for using certain types of cookies and similar technologies and/or for sharing data with third parties*
  - a. **Type of data:** IP address and related information such as location and internet provider, browser and content type, version and settings may be collected.
  - b. **Source of data:** data is obtained automatically through your use of the website contact forms and from external parties such as Microsoft Forms, Google Forms (for more details please visit our Cookie Policy).
  - c. **Purpose:** maintaining our websites and general statistics.
  - d. **Legal basis:** the legal basis may differ depending on local laws applicable, but generally we consider that our legitimate interests justify the processing unless you specifically consent to some type of processing; we find such interests to be justified considering that the data is limited to browsing activities related to what is considered business or professional related (our website does not offer any content directed to individual consumers as well as any content which might be used for any inferences about your private life habits or interests), we provide easy opt-out and limit the retention of data before it is anonymized or deleted, data is also aggregated or pseudonymized unless for activities linked to submitting any webforms which might be linked to your identity submitted through such form.

- e. **Retention period:** for details of expiration of cookies/similar technologies please visit our Cookie Policy, other data will be anonymized or deleted within 2 years; for data directly linked to submitting a webform please visit section 2 below.
- f. **Requirement to provide data and consequences of not providing:** you are not required to provide any data yourself for cookies.
- g. **Your rights:** your rights may differ depending on local laws applicable, but generally (as far as applicable laws provide you with such rights) you would be entitled to: withdraw your consent at any time (which shall not affect the lawfulness of processing based on consent before its withdrawal), object to the processing of personal data, access your data and have inaccurate data corrected, obtain a copy of personal data, ask us about any relevant details of processing, ask for erasure or restriction of processing, and to lodge complaints with relevant authorities (in particular in the country where you live, work or where the alleged infringement took place).  
Please note that you can always **opt-out** from processing (object to processing) and request us to delete your data by submitting your request and we will only refuse if we have a compelling legal justification to keep the data.  
You will also not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- h. **Data recipients and transfers:** ADC employees from the relevant teams, companies processing the data on our behalf (including for technical, software and marketing support), independent third parties (for more details please visit our Cookie Policy). Depending on applicable local laws you may obtain from us further information about specific entities having access to the data and details on any data transfers.

## 2. Data collected through webforms and when you contact us directly:

- a. **Type of data:** depending on the webform and content of your communication to us, this includes business contact details, content of your communication, information you have received and about interactions with us, as well as information about how you use our website, and any publicly available information such as public information about the company you represent and your official position.
- b. **Source of data:** the data is provided by you directly, through interactions with our company and websites, and from publicly available sources of business-related information.
- c. **Purpose:** to provide you with requested information and respond to your queries as well as for direct marketing of our services and products.
- d. **Legal basis:** the legal basis may differ depending on local laws applicable, but generally we consider that our legitimate interests justify the processing unless and until you ask us to provide specific services or products, in which case existing or intended contract provides a legal basis; we find such interests to be justified considering that the data is limited to what is usually shared by the people acting in their business or professional capacities and we provide easy opt-out (we will only refuse deleting your data if we have a compelling legal justification to keep them).
- e. **Retention time:** 2 years since the last interaction, unless the existing contract, legal claim or legal requirement justifies further processing of which you will be informed (data will be reviewed annually and data which is not relevant will be deleted).
- f. **Requirement to provide data and consequences of not providing:** some fields are marked necessary in our webforms in order to submit such forms. You have to provide such data to be able to submit a form and to obtain required information.
- g. **Your rights:**

- Depending on local laws applicable, you would be entitled to: object to the processing of personal data, access your data and have inaccurate data corrected, obtain a copy of personal data (in some cases in portable format), ask us about any relevant details of processing, ask for erasure or restriction of processing, and to lodge complaints with relevant authorities (in particular in the country where you live, work or where the alleged infringement took place).
  - Please note you can always **unsubscribe** to communication through clicking **unsubscribe** available in the communication(s) you receive.
  - You will not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- h. **Data recipients and transfers:** ADC employees from the relevant teams, companies processing the data on our behalf (including for technical, software and marketing support), independent third parties when this is necessary (auditors, government offices, lawyers, inspection agencies) or based on your choices and actions (as when you ask us to send you a shipment or letter using a third-party provider). Depending on applicable local laws you may obtain from us further information about specific entities having access to the data. Any subsequent transfers will follow applicable local laws. For data transferred outside of India you will be notified accordingly.

### 3. Legal Disclaimer

In certain situations, ADC may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security requirements as well as instances requiring co-operation with law enforcement agencies where mandated by law.

We may also disclose your personal information as required by law, such as to comply with legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

### 4. Safeguarding personal data

We use a range of security measures to protect your personal information. Please be aware, however, that ADC cannot guarantee that third parties will safeguard your personal data in a similar manner. Unencrypted information - including information sent via E-mail - may also be able to be read by third parties. As a user of our services, you are responsible for protecting the information you provide, including username and passwords, from misuse, by encryption or other means.

### 5. Contact

If you have any questions about this Privacy Statement or unresolved privacy or data use concern that we have not addressed satisfactorily then you can contact the Global Privacy Office online via [dpo@gandhifellowship.org](mailto:dpo@gandhifellowship.org).

### 6. Update of Privacy Statement

We may amend this Privacy Statement from time to time.

If we materially change our Privacy Statement, we will take steps to inform you of the change. We may do this through email, SMS, notices on our websites or other means (or a combination of these means) in line with the permission you have given us to contact you.

The “Effective Date” at the top of this Privacy Statement shows when it was last updated.