

PRIVACY POLICY

Dakshayani and Amaravati Health and Education
Compliant with the Digital Personal Data Protection Act, 2023 (India) | Version 1.0

Dakshayani and Amaravati Health and Education (hereinafter referred to as "the Organisation", "we", "us", or "our") is a not-for-profit organisation registered in India, committed to advancing community health, health literacy, and equitable access to wellness resources. We deeply value the trust that donors, volunteers, beneficiaries, programme partners, and website visitors place in us.

This Privacy Policy sets out the manner in which we collect, use, store, share, and protect your personal data when you interact with our website at www.dakshamahealth.org, participate in our programmes, make donations, or otherwise engage with us. It also describes your rights under applicable Indian law, in particular the Digital Personal Data Protection Act, 2023 ("DPDP Act").

By using our website or providing us with your personal data, you consent to the practices described in this Policy.

1. Scope and Applicability

This Policy applies to:

- All individuals who visit our website (www.dakshamahealth.org);
- Donors, sponsors, and funding partners who contribute to the Organisation;
- Volunteers, interns, and community health workers engaged with our programmes;
- Beneficiaries and individuals who participate in our health initiatives;
- Programme partners, vendors, and contractors who work with us; and
- Any person who communicates with us via email, phone, forms, or social media.

This Policy does not apply to third-party websites, applications, or services that may be linked from our website. We encourage you to review the privacy policies of those third parties independently.

2. Data Fiduciary – Who We Are

Under the DPDP Act, 2023, the Organisation acts as the Data Fiduciary, meaning we determine the purpose and means of processing your personal data.

Registered Name: Dakshayani and Amaravati Health and Education

Registered Address: VANI House, First Floor, Opposite Singla Sweets, Dwarka Sector 8, New Delhi, India - 110077

Phone: +91 81300 50439

Email: communications@dakshamahealth.org

Website: www.dakshamahealth.org

3. Personal Data We Collect

Office: VANI HOUSE, 1st Floor, PSP Pocket, Plot No 7, Dwarka Sector 8, New Delhi - 77
Ph. No. 011 4944 2246, +91 8130050439, **Email:** communications@dakshamahealth.org

We collect only such personal data as is necessary for the specific, legitimate purposes described in this Policy.

3.1 Identity and Contact Information

- Full name, title, and designation
- Email address and phone number
- Postal address (for donor receipts, correspondence, or programme delivery)
- Date of birth (where required for programme eligibility or legal compliance)

3.2 Donor and Financial Information

- PAN (Permanent Account Number) – required by law for donations above INR 2,000 to issue 80G tax exemption certificates
- Donation amounts, frequency, and method of payment
- Bank account or UPI details (only where mandated for refunds or direct transfers; we do not store full card or banking credentials)
- CSR contribution records and corporate donor details

3.3 Health and Programme Information

- Health-related information voluntarily submitted by beneficiaries participating in our health programmes (e.g., age group, general health conditions relevant to the programme)
- Feedback, survey responses, and testimonials

Note: We treat any health-related data as sensitive personal data and apply heightened protection measures. We collect health data only with explicit informed consent and only to the extent strictly necessary for programme delivery.

3.4 Volunteer and Partner Information

- Professional qualifications, areas of expertise, and availability
- Emergency contact details (for field volunteers)
- Background or reference information (where required for safeguarding purposes)

3.5 Website Usage Data

- IP address, browser type, operating system, and device type
- Pages visited, time spent on pages, and navigation paths
- Cookies and similar tracking technologies (see Section 7)

3.6 Communications Data

- Emails, messages, and enquiries sent to us
- Records of your consent and preference selections
- Social media interactions with our official pages

4. How We Collect Your Personal Data

We collect personal data through the following means:

- Directly from you – through website forms, donation portals, event registrations, email correspondence, phone calls, or in-person interactions at our programmes;
- Automatically – through cookies, web analytics tools, and server logs when you browse our website (see Section 7);
- From third parties – where you have authorised a payment gateway, crowdfunding platform, or corporate employer to share your data with us; and
- From publicly available sources – for the purposes of due diligence on institutional donors or partners, where permitted by law.

5. Purposes of Processing and Lawful Basis

Under the DPDP Act, 2023, we process your personal data only for specified, clear, and lawful purposes:

a) Responding to enquiries and providing information about our programmes

Lawful Basis: Consent / Legitimate interests of the Organisation as a public health nonprofit.

b) Processing donations and issuing receipts and 80G certificates

Lawful Basis: Contractual necessity; Compliance with legal obligations under the Income Tax Act, 1961 and FCRA, 2010 (as applicable).

c) Delivering health programmes and services to beneficiaries

Lawful Basis: Explicit consent of the Data Principal; Legitimate organisational interests in furtherance of our charitable objects.

d) Managing volunteer and partner relationships

Lawful Basis: Contractual necessity; Consent.

e) Sending updates, newsletters, and information about our initiatives and fundraising

Lawful Basis: Consent – you may withdraw consent at any time (see Section 11).

f) Conducting internal research, impact assessments, and programme evaluations

Lawful Basis: Legitimate organisational interests; data is anonymised wherever possible before use for research purposes.

g) Complying with legal and regulatory obligations

Lawful Basis: Legal obligation – including obligations under the DPDP Act, 2023; IT Act, 2000; Income Tax Act, 1961; FCRA, 2010; and other applicable laws.

h) Improving our website, digital communications, and user experience

Lawful Basis: Legitimate organisational interests in improving our public-facing services.

6. Sensitive Personal Data

Certain categories of personal data are considered sensitive under Indian law and the DPDP Act, 2023. Where we collect sensitive personal data (such as health or medical information), we:

- Obtain explicit, informed, and freely given consent from the Data Principal before collection;
 - Clearly explain the purpose and use of such data at the point of collection;
 - Limit collection to what is strictly necessary for the stated purpose;
 - Apply additional technical and organisational safeguards, including restricted access and encryption;
 - Retain such data only for as long as necessary and delete it promptly upon expiry of the retention period; and
 - Never share sensitive data with third parties except as strictly required for programme delivery.
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7. Cookies and Tracking Technologies

Our website may use cookies and similar tracking technologies to enhance your browsing experience, understand how visitors use our site, and improve our content and services.

7.1 Types of Cookies We May Use

- Essential/Strictly Necessary Cookies: Required for the website to function. They cannot be disabled.
- Analytics Cookies: Help us understand how visitors interact with our website (e.g., Google Analytics). Data collected is aggregated and anonymised.
- Preference Cookies: Remember your settings and preferences (e.g., language, accessibility settings).

7.2 Your Cookie Choices

On your first visit to our website, you will be presented with a cookie consent banner. You may accept all cookies, accept only essential cookies, or manage your preferences. You can also disable cookies through your browser settings at any time.

8. Sharing of Personal Data

The Organisation does not sell, rent, or trade your personal data to any third party for commercial purposes. We share your data only in the following limited circumstances:

8.1 Service Providers and Data Processors

We may engage trusted third-party service providers (acting as Data Processors) to assist us with functions such as payment processing, email communications, website hosting, data analytics, or donor management. These providers process data only on our instructions and are bound by data processing agreements.

8.2 Regulatory and Government Authorities

We may disclose personal data to government or regulatory authorities when required to do so by law, including (but not limited to) the Ministry of Home Affairs (under FCRA), the Income Tax Department, the Registrar of Societies, or where ordered by a court of competent jurisdiction.

8.3 Funding Partners and Grantors

Where required by grant agreements, we may share anonymised, aggregated programme data with institutional donors, CSR funding partners, or government grant bodies for monitoring and evaluation purposes. We will never share individually identifiable beneficiary data with funders without explicit consent.

8.4 Programme Partners

Where the Organisation delivers programmes in partnership with other NGOs, healthcare providers, or government bodies, limited personal data may be shared on a need-to-know basis, subject to appropriate data sharing agreements.

8.5 Cross-Border Data Transfers

We primarily store and process your data within India. If any data is transferred outside India, we will ensure such transfer complies with the requirements of the DPDP Act, 2023, including applicable government notifications regarding permitted countries or territories.

9. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law:

- Donor records (including PAN and donation amounts): 7 years from the date of donation, as required under the Income Tax Act, 1961 and FCRA, 2010.
- Programme beneficiary data: Duration of the programme plus 3 years, or as specified in grant agreements, whichever is longer.

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- Volunteer and partner records: Duration of engagement plus 2 years.
- Website analytics data: 26 months, in anonymised form.
- General correspondence and enquiry data: 2 years from the date of last communication.
- Consent records: Retained for the duration of our relationship with you and for 3 years thereafter.

Upon expiry of the applicable retention period, personal data is securely deleted or anonymised.

10. Data Security

The Organisation implements reasonable and appropriate technical and organisational measures to protect your personal data against unauthorised access, disclosure, alteration, or destruction. These measures include:

- Use of secure, encrypted connections (HTTPS/SSL) on our website;
- Password protection and role-based access controls for internal systems containing personal data;
- Regular review of access permissions to ensure only authorised personnel can access personal data;
- Staff awareness and training on data protection responsibilities; and
- Incident response procedures in the event of a data breach.

No method of electronic transmission or storage is completely secure. In the event of a personal data breach that is likely to result in harm to Data Principals, we will comply with our notification obligations under the DPDP Act, 2023.

11. Your Rights as a Data Principal

Under the Digital Personal Data Protection Act, 2023, you – as a Data Principal – have the following rights with respect to your personal data held by the Organisation:

11.1 Right to Access and Summary

You have the right to obtain a summary of the personal data we hold about you and to know the identities of Data Processors and other Data Fiduciaries with whom your data has been shared.

11.2 Right to Correction and Erasure

You have the right to request correction of inaccurate or incomplete personal data, and to request erasure of personal data that is no longer necessary for the purpose it was collected, subject to our legal retention obligations.

11.3 Right to Withdraw Consent

Where processing is based on your consent, you have the right to withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out prior to withdrawal.

11.4 Right to Grievance Redressal

You have the right to raise a grievance with the Organisation regarding our processing of your personal data. We will respond to all grievances within a reasonable timeframe (see Section 13).

11.5 Right to Nominate

You have the right to nominate another individual to exercise your rights in the event of your death or incapacity, as permitted under the DPDP Act, 2023.

11.6 Right to Complain to the Data Protection Board

If you are not satisfied with our response to your grievance, you have the right to file a complaint with the Data Protection Board of India once constituted under the DPDP Act, 2023.

12. Personal Data of Children and Persons with Disabilities

In accordance with Section 9 of the DPDP Act, 2023, we will:

- Obtain verifiable consent from the parent or lawful guardian of a child (individual under 18 years) before processing any personal data of a child;
- Not process children's personal data in a manner that is detrimental to their wellbeing;
- Not undertake tracking, behavioural monitoring, or targeted advertising directed at children; and
- Apply the same protections to personal data of persons with disabilities where a lawful guardian provides consent on their behalf.

13. Grievance Officer

In accordance with the DPDP Act, 2023, the Organisation has designated a Grievance Officer to address complaints and queries relating to personal data processing.

Grievance Officer: Dakshama Health – Data Protection Point of Contact

Email: communications@dakshamahealth.org

Address: VANI House, First Floor, Opposite Singla Sweets, Dwarka Sector 8, New Delhi, India - 110075

Phone: +91 81300 50439

We will acknowledge all grievances within 48 hours of receipt and endeavour to resolve them within 30 days.

14. Third-Party Links and Platforms

Our website may contain links to external websites, social media platforms, fundraising portals, or partner organisations. This Privacy Policy does not apply to any such third-party websites or platforms. We are not responsible for the privacy practices, content, or security of any third-party sites.

15. Not-for-Profit Specific Provisions

15.1 Donor Anonymity

We respect your choice regarding donor recognition. If you wish to make an anonymous donation, please indicate this at the time of donation. We will respect your preference in all public communications, reports, and publications. However, we are required to maintain your PAN and donation records internally for regulatory compliance.

15.2 Use of Data for Impact Reporting

We may include anonymised and aggregated data in our annual reports, impact assessments, grant reports, and public communications. No individual will be identified in such reports without their explicit written consent.

15.3 Testimonials and Photographs

We may seek your consent to use your testimonial, photograph, or story in our communications or fundraising materials. Such use will always be subject to your explicit prior consent, which you may withdraw at any time. Consent for use of images of children must be obtained from a parent or guardian.

15.4 FCRA Compliance

The Organisation is governed by the Foreign Contribution (Regulation) Act, 2010 (FCRA) in respect of foreign contributions received. Personal data of foreign donors may be disclosed to the Ministry of Home Affairs as

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required under FCRA and applicable rules. Such disclosures are mandatory legal obligations and are not subject to data erasure requests.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or the services we provide. The updated Policy will be published on our website. Where changes are material, we will notify registered users and donors by email or through a prominent notice on our website.

17. Governing Law and Jurisdiction

This Privacy Policy is governed by and construed in accordance with the laws of India, including the Digital Personal Data Protection Act, 2023, the Information Technology Act, 2000, and all subordinate rules and notifications thereunder. Any disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the courts at New Delhi, India.

18. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Policy or our data processing practices, please contact us:

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