

Privacy Notice

This Privacy Notice outlines SoulScale's approach to privacy to fulfill its obligations under applicable privacy laws.

This Privacy Notice applies to all your **Personal Data** processed by us, whether in physical or electronic mode.

Please note that this Privacy Notice is applicable to all instances where we play the role of a **Data Fiduciary** of your Personal Data, when we collect and process personal data about you for offering our products or services.

SoulScale is committed to keeping your Personal Data private. We process any Personal Data we collect from you in accordance with the applicable laws and regulations and the provisions of this Privacy Notice. Please read the following carefully to understand our views and practices regarding your Personal Data and how we treat it.

Throughout this document, the terms "we", "us", "our" & "ours" refer to SoulScale. And the terms "you", "your" & "yours" refer to YOU (as the Data Principal).

What Personal Data do we Collect & Process? [PA1]

Categories of Personal Data that we collect, and process are as follows:

- Demographic & Identity Data (for e.g., name, address, email address, contact number, Aadhar number, PAN details)
- Financial Data (for e.g., account details)
- Online Identifiers and other Technical Data (for e.g., IP address, transaction logs, device details)
- Profession and education (for e.g. educational qualification, occupation)
- Special categories of data (for e.g. racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning health or data concerning a natural person's sex life or sexual orientation, caste).

Where do we obtain your Personal Data from? [PA2]

Most of the Personal Data we process is provided by you directly to us when you use our services, make a donation, request a communication from us, register for an on-ground event, pledge support to our work and campaigns and apply for working or volunteering. This also includes the Personal Data collected automatically and in the background by us when you use our website and application(s).

We may also receive Personal Data about you from third parties and publicly available sources of information.

How do we use your Personal Data? [PA3]

We use your Personal Data for the following purposes:

- To verify your identity
- To deliver our services
- To communicate with you regarding our services availed by you, including notifications of any alerts or updates
- To evaluate, develop and improve our services
- For analysis and research
- To handle enquiries and complaints
- To comply with legal or regulatory requirements
- To investigate, prevent, or take action regarding illegal activities, suspected fraud and situations involving potential threats to the safety of any person

Lawful Bases of processing your Personal Data

We process your Personal Data by relying on one or more of the following lawful bases:

- You have explicitly agreed to/consented to us processing your Personal Data for a specific reason
- The processing is necessary for employment purposes
- The processing is necessary for compliance with a legal obligation we have
- The processing is necessary for other reasonable purposes

Where the processing is based on your consent, you have the right to withdraw your consent at any point in time. Please note that should the withdrawal of consent result in us not being able to continue offering our products and services to you, we reserve the right to withdraw or cease our products and services to you upon your withdrawal. You may withdraw consent by contacting us with a written request to the contact details specified below in the 'Contact Us' section. Upon

receipt of your request to withdraw your consent, the consequences of withdrawal will be communicated to you. Upon your agreement to the same, your request for withdrawal will be processed.

When do we share your Personal Data with third parties? [PA4]

We may use third parties in the provision of our services to you. We may share your Personal Data with such third parties. We have appropriate contracts in place with all such third parties. This means that they are not permitted to do anything with your Personal Data which is outside of the scope specified by us. They are committed to hold your Personal Data securely and retain it only for the period specified in our contracts with them.

1. Reasons for sharing your Personal Data with third parties:

We may disclose your Personal Data to third parties only where it is lawful to do so. This includes instances where we or they:

- need to provide you with services
- have asked you for your consent to share it, and you have agreed
- have a reasonable ground for doing so
- have a legal obligation to do so. For e.g., to assist with detecting and preventing fraud
- have a requirement in connection with regulatory reporting, litigation or asserting or defending legal rights and interests

We may also disclose your Personal Data to appropriate authorities if we believe that it is reasonably necessary to comply with a law, regulation, legal process; protect the safety of any person; address fraud, security, or technical issues; or protect our rights or the rights of those who use our products & services.

2. With whom your Personal Data may be shared:

We may disclose your Personal Data to the following third parties:

- Our partners who help us in providing our services (for e.g. our training partners, medical practitioners, partner NGOs)
- any sub-contractors, agents, volunteers or service providers who work for us or provide services or products to us

- law enforcement authorities, government authorities, courts, dispute resolution bodies, regulators, auditors and any party appointed or requested by applicable regulators to carry out investigations or audits of our activities
- statutory and regulatory bodies, authorities (including the government) investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose Personal Data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals

Cross-border data transfer

Personal Data we hold about you may be transferred to other countries outside of India for any of the purposes described in this Privacy Notice.

Any personal data will be protected in accordance with this Privacy Notice as well as with adequate protections in place in compliance with applicable laws and regulations.

Use of Cookies and other Tracking Mechanisms

We may use cookies and other tracking mechanisms on our website and other digital properties to collect data about you.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information about your actions to the owners of the website.

Most web browsers allow you some control of cookies through browser settings.

Outlined below are the categories of cookies along with a description of what they are used for.

- **Strictly Necessary Cookies** - These cookies are needed to run our website, to keep it secure and to comply with regulations that apply to us.
- **Functional Cookies** – We may use functional cookies on our website. These cookies allow us to remember information you enter or choices you make (such as your username, language, or your region) and provide you with enhanced, more personalised features.
- **Performance/Analytics Cookies** – We may use performance/analytics cookies on our website. These cookies collect information about how visitors use our website and services, including which pages visitors go to most often and if they receive error messages from certain pages. It is used to improve how our website functions and performs. [PA5]

- **Marketing Cookies** – We may use marketing cookies on our website. These cookies help us decide which of our products, services and offers may be relevant for you. We may use this data to tailor the marketing and ads you see on our own and other website and mobile apps, including social media. For instance, you may see our ads on other sites after you have been to our website.

We may also use trackers (such as web beacons, tags, pixels) on our website and other digital properties to collect data about you.

We may also collect Personal Data about you via our mobile app - Resilience Connect, via permissions in the app. This is primarily used to enhance the functionality of the app and to analyse it to serve you better.

How do we secure your Personal Data?

We are committed to protecting your Personal Data in our custody. We take reasonable steps to ensure appropriate physical, technical and managerial safeguards are in place to protect your Personal Data from unauthorized access, alteration, transmission and deletion. We ensure that the third parties who provide services to us under appropriate contracts take appropriate security measures to protect your Personal Data in line with our policies. [PA6]

How long do we keep your Personal Data?

We keep the Personal Data we collect about you for as long as it is required for the purposes set out in this Privacy Notice and for legal or regulatory reasons. We take reasonable steps to delete your Personal Data that is no longer needed.

Links to other Websites

Our website may contain links to websites of other organizations. This privacy notice does not cover how those organizations process your Personal Data. We encourage you to read the privacy notices on the other websites you visit.

Contact Us

For any queries and complaints related to privacy, or exercising your rights, you could reach us at:

Email: privacy@soulscale.org

Notification of changes

We regularly review and update our Privacy Notice to ensure it is up-to-date and accurate. Any changes we may make to this Privacy Notice in future will be posted on this page.

Your Privacy rights

If you are an Indian resident, under the India Personal Data Protection Bill 2019, you have the following rights, and we commit to provide you with the same:

- **Right to Confirmation and Access:** You have the right to get confirmation and access to your Personal Data that is with us along with other supporting information.
- **Right to Correction:** You have the right to ask us to rectify your Personal Data that is with us that you think is inaccurate. You also have the right to ask us to update your Personal Data that you think is incomplete or out-of-date.
- **Right to Erasure:** You have the right to ask us to erase your Personal Data that is with us under certain circumstances.
- **Right to Data Portability:** You have the right to ask that we transfer the Personal Data you gave us to another organisation, or to you, under certain circumstances.
- **Right to be Forgotten:** You have the right to restrict or prevent the continuing disclosure of your personal data under certain circumstances.
- **Right to lodge a complaint with the Authority:** You have the right to lodge a complaint with the Authority.

If you wish to make a request to exercise any of your rights, you can contact us using the details in the 'Contact us' section of this notice.

There should be contracts with a third party that include data privacy clauses if personal data is shared with that third party.