



UNITED WAY OF MUMBAI

PRIVACY POLICY

Last updated on 17th May 2024

A. PURPOSE AND SCOPE

We, **United Way of Mumbai** ("**UWM**" or "**we**" or "**our**" or "**us**"), are committed to protecting the privacy of the information provider ("**you**" / "**your**" / "**yourself**"). We consider privacy and protection of your data/ information to be of high importance. Our practices and procedures in relation to the collection and use of your data/ information have been set-out below in this privacy policy ("**Privacy Policy**"). This Privacy Policy will familiarize you with the manner in which UWM may collect, use, share, transfer and disclose your data/ information through <https://www.unitedwaymumbai.org> (the "**Website**"). This Privacy Policy forms an integral part of our terms and conditions to use our Website ("**Terms & Conditions**") <https://www.unitedwaymumbai.org/terms-conditions>.

UWM reserves the right, at its discretion, to change, modify, amend, add or remove portions of the Terms & Conditions including this Privacy Policy at any time without notice. We recommend that you review the Terms & Conditions and this Privacy Policy periodically to ensure that you are aware of the current privacy practices of UWM. By visiting our Website and/or using the Website, you agree to be bound by the terms and conditions of this Privacy Policy (which includes the Terms & Conditions), agree the use of your personal information (including sensitive personal information) by UWM in accordance with this Privacy Policy. You also agree to and consent to collecting, storing, processing, transferring, and sharing your personal information (including sensitive personal information) by UWM with third party service providers for the purposes set out in this Privacy Policy.

This Privacy Policy shall be construed to be provided in compliance with the Digital Personal Data Protection Act, 2023 ("**DPDP Act**"), the Information Technology Act 2000 ("**IT Act**") and applicable rules framed thereunder, as amended from time to time, and shall be read with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011 ("**SPDI Rules**"), as applicable.

B. COLLECTION OF INFORMATION

1. In this Privacy Policy, unless the context otherwise requires '**Personal Information**' 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 UWM, is capable of identifying such person and shall include the following:
 - a) information such as your name, job title, postal address (home and business), telephone number, mobile phone number and email address;
 - b) officially valid documents submitted for 'know your customer' compliance;
 - c) any business information in connection with any project or any contractual relationship with UWM or provided by you voluntarily;



- d) your user id and password and other security related information for accessing the Website;
 - e) volunteering on projects implemented or carried out by UWM;
 - f) information collected from publicly available resources and public data bases;
 - g) information provided in your application for any job with UWM like your experience, qualifications, your current compensation package and expected compensation package, references etc;
 - h) details of all your visits to UWM's premises including the Website;
 - i) information to verify your identify which may be required to provide you with the response that you may seek through our 'contact us' link.
 - j) Email communications which may be sent to UWM will be routed through our systems and stored in our systems;
 - k) Tracking technologies may automatically record information such as domain and host names, other information about your geographic location, IP addresses, browser software and operating system types, your manner of connecting to the Internet (e.g., connection speed through narrowband or broadband access), and dates and times that our Website is accessed, hardware model, device hardware information, IMEI number and other unique device identifiers, phone number, serial number, current software version, mobile country code, mobile network, MAC address, cookies, pixels and settings of the devices you use to access our Website;
 - l) information which you may provide;
 - m) information which you may provide while providing any feedback or completing a questionnaire or raising a complaint;
 - n) your location through your device's GPS signal or information about nearby Wi-Fi access points and cell towers that may be transmitted to us when you use certain services and enable the location function on your device;
2. We may collect personal information about you under number of circumstances including (i) when you or your organisation visit, make an enquiry or otherwise interact on the Website;(ii) in meetings and providing contact details; or (iii) when you or your organisation offer to provide services to us or we offer to provide services to you.
3. We may collect information from the donors who donate or make contributions on our Website about their place of establishment, bank account information, licenses and registrations for identity verification and other purposes.



4. You represent that the information or data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consents to provide such information or data. Your providing the data/ information and UWM's consequent storage, collection, usage, transfer, access or processing of the same shall not be in violation of any third-party agreement, laws, judgments, orders or decrees.
5. In general, the users of the Website can access the Website's home page and browse some areas of the Website, without disclosing any Personal Information.
6. However, UWM tracks information provided by visitor's browser, including the website the visitor came from (known as the referring URL), the type of browser used and other information that does not personally identify any visitor of the Website. This may include installation of cookies and collection of other session data.
7. We do not have any system to collect Personal Information automatically. In order to access our activities and projects, you will have to register with us and provide Personal Information. It is completely optional on your part to provide Personal Information and register with us. However, you will not be able to access certain sections or interact with us unless you register with us and provide the Personal Information.
8. If any Personal Information of any third party such as your office colleagues, directors or employees or someone with whom you have business dealings are shared with UWM then you must ensure that you have the authority and entitled to disclose that Personal Information to us and we may collect, use and disclose that Personal Information as described in this Privacy Policy without taking any further steps or actions on behalf of UWM. In particular, you should ensure that the concerned individual is aware about this Privacy Policy, including our identity, contacting us, purposes of collection, use and processing of Personal Information, transferring and sharing Personal Information, the individual's right to obtain access to the Personal Information and make complaints about the handling of the Personal Information, and the consequences if the Personal Information is not provided (such as our inability to provide services).

C. USE AND PROCESSING OF DATA/ INFORMATION

1. The information collected by UWM may be used for a number of purposes connected with our activities which may include the following:
 - a) to verify your identity and confirm your eligibility to access and use our Website and make donations or contributions through our Website;
 - b) to manage and oversee your or your organisation's relationship with UWM;
 - c) to comply with our legal obligations, compliance obligations and may contact you to confirm your identity which may be relevant for compliance purposes;
 - d) to prevent and detect fraud and misconduct as to protect the security of our sponsors and donors, beneficiaries and our Website;



- e) to allowing you to create your own profile on our Website in order to access the sections of the Website without having to provide personal information again every time you access our Website;
 - f) to analyse and improve our activities and communications with you;
 - g) to monitor and check compliance with our policies and standards;
 - h) to comply with our legal and regulatory obligations including reporting to and/or being audited by national and international regulatory authorities;
 - i) to comply with court orders and exercise and/or defend legal rights of UWM;
 - j) for any purpose related, incidental and/or ancillary to any of the above or any other purpose for which your Personal Information was provided to us.
 - k) if you submit your review about our activities then it will be published on our Website and other people will be able to view you reviews and experiences and other details shared with us;
 - l) dealing with requests, enquiries and complaints and related activities;
 - m) responding to your queries and fulfilling your requests for information regarding our activities;
 - n) communicate with you regarding the activities for which you have provided your contribution/ donation and respond to your questions and comments;
 - o) sharing articles, blogs, newsletters, promotional materials and other important information regarding our activities for legitimate business purposes;
 - p) to conduct survey about how satisfied our donors/ contributors are and for improving our performance;
 - q) legitimate business purposes; and
 - r) responding to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law.
2. In addition, the processing may be based on your consent where you have expressly given that to us.

D. DISCLOSURE AND TRANSFER OF YOUR PERSONAL INFORMATION

1. We do not sell or rent any Personal Information.



2. We may share your Personal Information to our partners, associates, service providers and third parties who may handle our data management, newsletter and email distribution, conducting surveys, events, and promotions, as necessary or appropriate:
 - a) to carry out activities on behalf of UWM under contract;
 - b) in any manner permitted under applicable law, including laws outside your country of residence;
 - c) to comply with any legal process whether local or foreign;
 - d) to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
 - e) to enforce our Terms & Conditions and policies;
 - f) when UWM, in its sole discretion, deems it necessary in order to protect its rights or the rights of others;
 - g) to protect our rights or property, privacy, safety or property, and/or that of our donors, you or others;
 - h) to allow us to pursue available remedies or limit the damages that we may sustain;
 - i) to third parties on a confidential basis for the purposes of collecting your feedback on the activities implemented/ carried out by UWM and to help us measure our performance and to improve and promote our activities;
 - j) with any third party to whom we assign or novate any of our rights or obligations;
 - k) with courts, law enforcement agencies, regulatory bodies or lawyers or other parties where it is reasonably necessary for UWM to exercise or defend a legal or equitable claim;
 - l) with third party service providers to process personal data on our behalf and in accordance with our instructions only. UWM will be responsible for your Personal Information and have control over the same and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your Personal Information when engaging such service providers;
3. Your data/ information will be kept confidential to the maximum possible extent and in accordance with the provisions set out herein.
4. Your Personal Information will be retained with us as long as you continue to use your account on our Website or as long as we continue to have a professional need to do so, unless a longer period is required by applicable law.

E. SOCIAL MEDIA SHARING FEATURE



We may have our social media platforms and you will be able to connect us through such social media platforms. In such case we may be able to identify you and relate the information shared through social media platforms with the information that we already have about you. Depending on your usage settings on social media platforms, all information shared by you may be available to others including your friends and general public.

F. SECURITY

We have taken steps and adopted industry-standard security measures to maintain the safety of your Personal Information. All electronic financial transactions performed through our Website are covered by encryption technology. All your Personal Information and data are stored on secured servers and are password and firewall protected. However, no transmission of electronic data can be guaranteed to be perfectly secured. As such, we cannot guarantee or certify the safety of any information transmitted or otherwise provided to us or received from us. You accept the inherent security implications of providing information over internet / cellular / data networks and will not hold UWM responsible for any breach of security or the disclosure of Personal Information unless UWM has been grossly and willfully negligent.

G. GENERAL

1. Your Personal Information will primarily be stored in an electronic form. However, certain data can also be stored in physical form.
2. Notwithstanding anything contained in this Privacy Policy or elsewhere, UWM shall not be held responsible for any loss, damage or misuse of your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event. A "Force Majeure Event" shall mean any event that is beyond the reasonable control of UWM and shall include without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption.
3. Our activities may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by websites or other services. You should exercise caution and review the privacy statements applicable to the third-party websites and services you use.
4. We will provide you with the right to review, access and modify the Personal Information that we maintain about you depending on technical feasibility and requirements of applicable laws. We may verify before providing you access to this Personal Information. However, we are not responsible for the authenticity of the Personal Information provided by you. You can access your information, including your name, address, payment options, profile information in the specified section of the Website.
5. You have the right to withdraw the consent provided to us in relation to your Personal Information at any time in writing by sending an e-mail to us at contact@unitedwaymumbai.org, in accordance with the terms of this Privacy Policy. However, please note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively. In case you do not provide your information or consent for usage



of Personal Information or subsequently withdraw your consent for usage of the Personal Information so collected, UWM reserves the right to discontinue the registration for which the said Personal Information was sought.

6. You can request UWM to delete the Personal Information provided by you to UWM by sending an e-mail to us at contact@unitedwaymumbai.org. However, please note that correction or deletion of certain information or data may lead to cancellation of your registration with the Website or your access to certain features of the Website. You also agree and acknowledge that certain data or information cannot be corrected or deleted and/or is prohibited from being deleted under any applicable law or in lieu of law enforcement requests or under any judicial proceedings.

H. YOUR RIGHTS REGARDING YOUR INFORMATION

Any questions regarding this Privacy Policy or our use of your Personal Information, you can reach to our grievance officer by email. Contact Details of our Grievance Officer is provided below:

Name : Sanaa Shaikh

e-mail : contact@unitedwaymumbai.org

Address : 6th floor, Mumbai Educational Trust, General AK Vaidya Marg, Bandra West, Mumbai 400050

I. CHANGES TO THIS PRIVACY POLICY

UWM reserves the right to revise and update this Privacy Policy at its sole discretion. Any such revisions will be effective on and from the date of posting the same on the Website and will apply to all information collected both prior to and following the effective date.