

Privacy Statement

1. General

- This Privacy Statement explains why Saathire Social Impact Solutions Private Limited (**SaathiRe**), and in limited instances, GiveIndia Inc. as controllers/data fiduciaries collect information about You (*defined below*), and how that information may be used, processed, protected and otherwise handled when You use or visit our website at <https://give.do/> domain (**Platform**). For the purpose of this Privacy Statement, SaathiRe and GiveIndia Inc. are collectively referred as “**Give**”, “**we**”, “**us**”, or “**our**”.
- This Privacy Statement applies to any person or entity (**You or Your**) that accesses the Platform or has shared any data about an individual who is identifiable by or in relation to such data (**PD**) with us. The Privacy Statement is an integral part of the Platform’s terms and conditions (**T&Cs**).
- You have been directed to this page to familiarise with the terms of this Privacy Statement as well as provide Your informed consent to the processing of PD. Without consenting to the terms herein, you cannot consent to the T&Cs and should not use the Platform. Before you submit any PD to us, please read this Privacy Statement for an explanation of how it will be processed by us. If You do not agree with this Privacy Statement, please do not use the Platform.
- We reserve the right to update the terms of this Privacy Statement and such changes will be posted on the Platform.

2. PD we collect

- We collect and process the PD provided by You when You access and browse our Platform; create, donate or subscribe to any fundraiser; request further services, subscribe to our newsletter and other content, contact us for help, use our messaging services, submit any enquiry, or otherwise enter information on the Platform before or during its use.
- PD collected includes the following categories:
 - (i) basic identification information like name, surname, name of organisation, IP address, photographs, age, logos, marks, and relationship;
 - (ii) identification information like identity proof, and tax identification information like PAN details;
 - (iii) contact information like phone number, e-mail address, mobile number, address, and country of residence;
 - (iv) financial and payment information like bank account details, cheque, invoices, KYC details, tax certificates, financial statements, and tax returns;
 - (v) information about Your Donation, including the campaign in which You are donating to and the amount of Your Donation;

- (vi) information about Your fundraiser or campaign such as title, category, images and beneficiaries;
 - (vii) device and hardware information for synching and seamless access;
 - (viii) location information;
 - (ix) information on how You use our Platform through our or third-party cookies such as duration for visiting or using Platform, how long You stayed on the Platform, items clicked, etc. To know more about the use of cookies, please review our [cookie policy](#); and
 - (x) social media URLs such as Facebook, Twitter, YouTube, Instagram, LinkedIn and other social media profiles.
- While using the Platform, You may be required to donate through the services of a third-party payment gateway provider. You understand, agree, and acknowledge that the Platform never receives Your PD provided to the third-party payment gateway. Your PD will be dealt by the third-party payment gateway provider in accordance with their respective privacy policies and other terms and conditions; and we shall not be liable, accountable or responsible for Your PD which You provide to the third-party payment gateway provider.
 - Whenever You use our Platform, in case of an error, we collect technical data and information of Your device such as IP address, device name, operating system version, the time and date of Your use of the Platform, and other statistics.

3. How do we collect PD?

We collect PD:

- directly from You when you voluntarily provide Your PD while accessing, browsing or using any part of the Platform; and
- indirectly from other sources such as cookies, web beacons, website traffic, information available in public domain through internet searches, analytic studies and other information that we may derive while processing PD. Please read more at our [cookie policy](#)

4. How do we process PD?

- We collect, record, organise, structure, align, retrieve, adapt, access, review, archive, analyse, pseudonymize, encrypt, decrypt, profile, transfer, perform other related technological and manual processing activities.
- We process PD in accordance with fair, accountable and transparent processing principles as required under applicable law. Governing principles that we follow for processing are:
 - (i) process lawfully, fairly and with transparency;
 - (ii) process only for purposes communicated, or those which are reasonably expected to be connected with the purposes, or for purposes which are compatible with them;

- (iii) minimise collection only as much is adequate, relevant and necessary for the processing purposes;
 - (iv) take reasonable steps to maintain accuracy in light of the processing purposes;
 - (v) retain in such form and for such duration as is permissible under law, bearing in mind the processing purposes;
 - (vi) use technical, operational, and organisational security measures;
 - (vii) prevent accidental loss, unlawful destruction, or access, or damage; and
 - (viii) maintain confidentiality and integrity of PD, unless carved out in this Privacy Notice.
- *Profiling*: Profiling means automated processing of PD to evaluate certain personal attributes about You. This aims at analysing Your behaviour while using the Platform. There will be no profiling by automated means that will affect Your PD protection rights and privacy.

5. Why do we process PD?

- We process PD for the following purposes:
 - (i) to enter into a lawful contract with You;
 - (ii) to provide You with information on services offered by us;
 - (iii) registering You on the Platform;
 - (iv) communicating with You;
 - (v) respond to any queries You submit to us;
 - (vi) conducting market research, surveys, trend research, analytics to understand Your need for using the Platform, demand for services, updates, upgrades and software feature requirements;
 - (vii) administering and protecting our operations and this Platform;
 - (viii) creating, improving and developing our Platform;
 - (ix) obtaining feedbacks from You and acting thereupon;
 - (x) to process donations and grants to charities;
 - (xi) to assist in processing tax deduction certificates;
 - (xii) send You information such as receipts, certificates, upcoming events, newsletters, etc.;
 - (xiii) protect and secure Your PD;
 - (xiv) detect and handle actual, suspected, or pre-empted data breach scenarios;
 - (xv) periodically review PD collected to adhere with Your requests regarding Your rights and legal obligations under applicable law;

- (xvi) maintaining secure personal information management system;
 - (xvii) archiving, statistics analysis, survey, R&D activities;
 - (xviii) manage our relationship with You;
 - (xix) compliance with applicable law;
 - (xx) promotion, marketing and advertising;
 - (xxi) sharing with third parties; more details about third party data transfer can be found [here](#);
 - (xxii) honouring Your requests and rights;
 - (xxiii) complying with contractual obligations;
 - (xxiv) manage payments, fees and charges; and
 - (xxv) defending or initiating legal, contractual and other equitable relief should such situation arise.
- Our legal basis for processing PD for the above purposes is premised on the following:
 - (i) For PD governed under EU GDPR and UK Data Protection Act's long-arm jurisdiction: The abovementioned processing activities are pursuant to processing basis under EU General Data Protection Regulation (**EU GDPR**), being Article 6(1)(b) of EU GDPR, i.e., for performing contract with You or entering into a contract with You; Article 6(1)(c) of EU GDPR, i.e., for compliance with legal obligation that we are subjected to; and Article 6(1)(f) of EU GDPR, i.e., for our legitimate interests in performing our contractual obligations with You and complying with legal and statutory requirements, in such manner so as not to override Your interests or fundamental rights and freedoms regarding Your PD, and Article 6(1)(a) of EU GDPR Your consent conferred through terms of use.
 - (ii) For PD otherwise: The abovementioned processing activities are pursuant to Your consent, lawful contract with us which is required for the Platform, compliance with applicable law and our legitimate interests.

6. How do we protect your PD?

- We take the safety of Your PD and its confidentiality very seriously and are committed to providing reasonable security safeguards that commensurate to the sensitivity of the PD being handled, including but not limited to implementation of reasonable technical, operational and physical safeguards.
- All our staff, personnel, officers, representatives and members receive appropriate and on-going training to ensure they are fully aware of their obligation to uphold confidentiality, protect PD, and respect Your privacy. Only limited authorised personnel and approved third parties have access to PD on a need-to-know basis and only for specific purposes.



- We require our partners and contractors to strictly adhere to applicable data protection laws, and additional requirements, so as to contractually obligate them to honour Your privacy expectations vis-à-vis your PD.
- We follow data minimization and retention practices diligently and should You wish to learn more about our processes on how we secure PD, please write to us at grievance@give.do.
- While we shall make reasonable endeavours to ensure that Your PD is duly protected by undertaking security measures in accordance with applicable laws, including the abovementioned measures, You are strongly advised to exercise discretion while providing PD and using our Platform, given that the internet is susceptible to security breaches.

7. How long do we store PD?

We will store and process Your PD for such duration as is necessary in order to fulfil the purposes stated in this Privacy Statement and comply with applicable law. For instance, when You make donations and are provided with tax exemption certificates, we are required under law to preserve data for certain number of years under applicable taxation laws. Under all circumstances, it is our practice to follow data minimization and retain it in a safe manner only for purposes already identified in this Privacy Statement. Our overarching goal is not to retain PD in identifiable form longer than what is necessary, after which they will be destroyed.

8. Sharing Your PD To Third Parties

- We do not sell, rent, or trade Your PD in any manner.
- We disclose PD on a strict need-to-know basis to our service providers, like hosting partners, cloud service providers, maintenance vendors who assist us in operating and maintaining the Platform, NGOs, and charities who are using donations for social impact and charitable activities. We may also disclose PD with advertising platforms and other similar service providers for availing promotional, advertising, market outreach and similar services.
- We may also disclose PD to other service providers if required for our operations including compliance with law, enforce our policies, or protect ours or others' rights, property or safety, investigate fraud, or respond to a government request.
- In all such instances, we require the third-party to maintain confidentiality, use PD only for the limited purpose for which it is disclosed, and restrict onward transfer. We also insist that the recipient destroys PD to the extent feasible once the purpose is achieved.
- Before transferring PD to a third party, we conduct reasonable due diligence factoring the purposes, such as evaluation of processes implemented, reserving audit and inspection rights, requiring representations, and mandating compliance with applicable laws concerning data protection and privacy from the third party. For processors, we require them to adhere to our privacy and data protection practices and policies as well. We also contractually require them to implement appropriate technical, operational and physical security safeguards.

9. What are your rights?

We do not intend to systematically offer the Platform and the Services to any non-profit-organisation acting as Recipients outside of the jurisdictions where Give operates from; however, the Platform can be accessed anywhere in the world by Users and Donors outside of such jurisdictions to seek information and make Donations to the Campaigns on the Platform in accordance with the T&Cs. Consequently and without prejudice to our rights under applicable laws, we undertake reasonable efforts to respond to your data protection rights and grievances in accordance with this Privacy Statement.

- For Users in any jurisdiction including India and USA, but excluding those jurisdictions which are specifically mentioned hereinafter, Your rights are:
 - (i) access – seek confirmation on whether and what PD is processed and seek access;
 - (ii) lodge complaint – file a complaint with appropriate authority under applicable law;
 - (iii) correction - correct inaccurate or misleading PD, complete incomplete PD, update outdated PD, provided it is essential for the purposes of processing;
 - (iv) withdraw or modify consent - withdraw or modify consent at any time; this will not affect processing that has taken place prior to the date You request such withdrawal or modification. If withdrawal or modification will have a bearing on You accessing the Platform or availing Services, we will notify You before acting on Your request; and
 - (v) erasure - erase PD; if You exercise this right, it may be the scenario that this may have a bearing on using and accessing the Platform and we will notify You before acting on Your request
- For Users in EU/EEA, Ireland, and United Kingdom, Your rights are:
 - (i) access - You can request a copy of the PD we are processing about You, and access to information about Your PD, processing purposes, PD categories, storage periods, and use of automated decision-making
 - (ii) rectify - You can rectify incomplete or inaccurate information that we process about You;
 - (iii) erasure - You can request us to delete the PD that we process about You, where it is no longer necessary, consent is withdrawn, or processing is unlawful;
 - (iv) restrict processing - You have the right to restrict our processing of Your PD where You believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose;
 - (v) portability - You can obtain PD we hold about You in a structured, electronic format, and transmit such data to another data controller;

- (vi) object - where the legal basis for processing Your information is our legitimate interest, You have the right to object to such processing on grounds relating to Your particular situation;
 - (vii) withdraw consent - You have the right to withdraw Your consent consented to our processing of Your PD at any time;
 - (viii) rights in relation to automated decision making and profiling - You have the right not to be subject to a decision, based solely on automated means if the decision produces legal effects concerning You or significantly affects You in a similar way;
 - (ix) lodge complaint - You can file a complaint with the local data protection authority if You believe that we have not complied with applicable data protection laws.
- For Users in Australia, Your rights are:
 - (i) access – You have the right to request access to any record that contains Your PD;
 - (ii) modification – You have the right to seek correction of inaccurate or misleading PD, deletion of PD, or addition to incomplete PD;
 - (iii) opt-out of direct marketing: You have the right to opt-out of receiving direct marketing communications; and
 - (iv) complain - You have the right to complain to the Office of the Australian Information Commissioner against alleged data privacy breaches, in the event the mechanism put in place by us to address your inquiries and complaints about non-compliance with applicable law is ineffective or does not sufficiently address Your concerns.
 - For Users in Canada, Your rights are:
 - (i) access and modification - You have the right to request access to information about the existence, use and disclosure of Your PD, including request for correction, deletion, or addition of information;
 - (ii) correction - You have the right to challenge the accuracy, and request completeness and updation of PD;
 - (iii) withdraw consent - You have the right to withdraw consent at any time by providing reasonable notice to us, subject to legal or contractual restrictions on us, and we will keep You informed of the consequences of withdrawal;
 - (iv) accountability – Our grievance officer is the point of contact and can be contacted as per details mentioned herein; and
 - (v) complain - You have the right to complain to the Privacy Commissioner, in the event the mechanisms established by us to receive and redress Your complaints are ineffective or insufficient in addressing Your complaints.
 - (vi)

- For Users in Singapore, Your rights are:
 - (i) access - You have the right to request information about whether Your PD is being processed, obtain information about PD, and receive copies in intelligible form;
 - (ii) correct PD - Where PD is inaccurate, incomplete, misleading, or not up-to-date, You may submit written data correction requests to make necessary corrections;
 - (iii) withdraw consent - You may withdraw Your consent to PD processing by providing written notice;
 - (iv) PD portability - You can obtain PD we hold about You in a structured, electronic format, and transmit such data to another data controller; and
 - (v) complain – You have the right to lodge a complaint with the local authority, where the mechanisms established by us to receive and address Your complaints are ineffective.
- For Users in UAE, Your rights are:
 - (i) to be informed about the legal basis and purpose of PD collection;
 - (ii) to access Your PD held by us, in accordance with the rules and procedures set out in the law;
 - (iii) to request obtaining Your PD held by us in a readable and clear format, in accordance with the controls and procedures specified in law;
 - (iv) to request modification, i.e., correcting, completing, or updating Your PD held by us;
 - (v) to request destruction of Your PD held by us when such PD is no longer needed by us for the communicated processing purposes;
 - (vi) to consent withdrawal;
 - (vii) to restrict processing;
 - (viii) to data portability;
 - (ix) to submit complaint with the UAE Data Bureau; and
 - (x) to seek protection from automated decision-making.

10. Grievance Redressal

You can exercise these rights or raise your grievances by writing to our grievance officer Mr. Teva Kannan at grievance@give.do. Prior to honouring your requests, we may require you to verify your identity and where you fail to furnish details relevant for such verification, our ability to respond to your requests shall be limited and we may not be able to honour such requests. Subject to verification of your identity, we will try our best to provide the necessary information in pursuance of your requests and redress your grievances within 30 days from receipt of the

request/grievance. If requests are excessive or unfounded or repetitive at our sole discretion, we can refuse to comply with Your request or charge a reasonable fee for costs, in which case You can choose to complain to appropriate authority. Should you require further details about our processes in this regard, please write to our grievance officer on the details mentioned herein.

11. Our cookie policy

- We use cookies, web beacons, mobile identifiers, tracking URLs, log data or similar technologies to help provide, protect and improve the Platform. Cookies are small files transferred to the hard drive of Your device that enables us to recognize Your browser, capture and remember certain information. They are also used to help us understand Your preferences based on previous or current activity on the Platform, which allows us to improve our Platform and better tailor the experience to Your interests and needs.
- Cookies and similar technologies aid us to understand Your navigation pattern and interaction on the Platform, serve You tailored advertising, show You content that may be relevant to You, monitor and analyse the performance, operation and effectiveness of the Platform, and for purposes of support, analytics, research, service development and compliance with applicable law.
- We also use cookies and similar technologies to help us compile aggregated and anonymized data about the traffic on the Platform, so that we can offer better experiences and tools in the future.
- In many cases, the information collected through these technologies is processed in a non-identifiable manner, without reference to PD. However, in some cases, it may be associated with the PD. Cookies and similar technology tools can either expire when You close Your browser, or continue to remain on Your device even after You close the browser.
- Please note that most browsers automatically accept cookies, and if You do not wish cookies to be used, You may need to actively delete or block the cookies. All browsers are different, and hence You must visit their “help” section to learn about cookie preference and other privacy settings. You can choose to reject or block all or specific types of cookies by clicking on the cookie preferences. For instance, [Microsoft Edge](#), [Google Chrome](#), [Mozilla Firefox](#), or [Apple Safari](#).
- We may also use third-party services that track this information. We are not responsible for third-party cookies and other similar technologies that get placed on the Platform. For example, to help us better understand how Users use our Platform, we work with a number of analytics partners, including Google Analytics. To prevent Google Analytics from using Your information for analytics, You may install the Google Analytics Opt-Out Browser by clicking [here](#). You must access Your cookie settings to set Your preferences, or review their cookie policy to further understand the details.
- If You are accessing the Platform through a mobile device, You can also update Your privacy settings on Your device by setting the “Limit Ad Tracking” and Diagnostics and Usage setting

property located in the settings screen of Your Apple device, or by resetting Your Android ID through apps that are available in the Play Store. You can also limit information collection by uninstalling the app on Your device and You can use the standard uninstall process available as part of Your device for this purpose.

- If You receive tailored advertising on Your device through a web browser, You can learn more about such tailored browser advertising and how You can generally control cookies from being put on Your device to deliver tailored advertising, by visiting the European Interactive Digital Advertising Alliance Consumer [Ad Choices link](#) for EU based advertising or for US based advertising either: (i) the Network Advertising Initiative's Consumer [Opt-Out link](#) or (ii) the Digital Advertising Alliance's Consumer [Opt-Out link](#) to opt-out of receiving tailored advertising from companies that participate in those programs. Please note that to the extent advertising technology is integrated into our Platform or other websites that You visit, You may still receive advertisements even if You opt-out. In that case, the advertising will not be tailored to Your interests. Also, we do not control any of the above opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices You make using these mechanisms or the continued availability or accuracy of these mechanisms.

12. Links to Other Sites

- The Platform may contain links to other third-party websites or any third-party electronic communication services who may or may not collect PD about You. We do not directly provide any PD to such third-party websites. If You submit Your PD to any of those sites, Your information will be governed by their privacy statements. We encourage You to read the privacy statement of any website You visit. We shall not be liable for any loss, damage, claim or expenses suffered by You as a result of accessing these third-party sites and features.

13. Contact

- If You have any questions, comments, rights request, or complaints, please contact our grievance officer Mr. Teva Kannan at grievance@give.do.