



ASEEMA CHARITABLE TRUST DATA PROTECTION POLICY

Aseema Charitable Trust

G3 Josephine Apartments, Ground Fl, Chimbai Road, Bandra West, Mumbai 400050



DATA PROTECTION POLICY

Ownership	Operations
Forum where approved	Board of Trustees
Date of Approval	July 2022

BACKGROUND:

Aseema Charitable Trust (Aseema/Organisation) is a Mumbai based non-governmental organization with a mission to equip children from marginalized communities with high quality, value based education enabling development of their limitless potential. In Mumbai, Aseema works in partnership with the Municipal Corporation of Greater Mumbai (MCGM) to create centres of excellence within the public education system. In each of these schools, Aseema supports the MCGM by providing teachers who are oriented to Aseema's child friendly approach, making the learning environment stimulating and safe and creating a culture that respects the child and promotes learning.

OBJECTIVE:

A data protection policy (DPP) is a security policy dedicated to standardizing the use, monitoring, and management of data. The main goal of this policy is to protect and secure all data consumed, managed, and stored by Aseema Charitable Trust (Aseema /organization). It is not required by law, but is commonly used to help organizations comply with data protection standards and regulations.

PURPOSE:

Aseema has an internal Data Protection Policy that outlines the principles and guidelines for the protection and management of data collected and processed by the organisation. As an education-based NGO, Aseema recognizes the importance of protecting the privacy and confidentiality of personal information entrusted to it. This policy is designed to comply with applicable data protection laws and regulations.

SCOPE:

This policy applies to all employees, volunteers, contractors, and third parties who handle personal data on behalf of the NGO. It covers personal data collected and processed in both electronic and physical formats.

POLICY:

1. Principles

Aseema is committed to the following data protection principles:

1.1. Lawfulness, Fairness, and Transparency: Personal data will be collected and processed in a lawful, fair, and transparent manner, ensuring that individuals are aware of the purposes for which their data is being collected.

1.2. Purpose Limitation: Personal data will only be collected for specific, explicit, and legitimate purposes. The personal data will not be processed in a way that is incompatible with these purposes.

1.3. Data Minimization: Personal data that is only necessary for the specified purposes will be collected and processed. Further it will be ensured that the data collected is adequate, relevant, and limited to what is necessary.

1.4. Accuracy: All reasonable steps will be undertaken to ensure that personal data is accurate, up-to-date, and kept relevant. Inaccurate or incomplete data will be promptly deleted or corrected.

1.5. Storage Limitation: Personal data will be kept in a form that permits identification of individuals for no longer than is necessary for the specified purposes. Data will be retained as per applicable rules and regulations for the specific categories.

1.6. Security: Appropriate technical and organizational measures will be implemented to ensure the security and integrity of personal data. This includes protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

1.7. Data Subject Rights: The rights of data subjects will be respected, including the right to access, rectify, erase, restrict processing, object to processing, and the right to data portability. Mechanisms will be provided for individuals to exercise these rights.

1.8. Accountability: Compliance with data protection laws and regulations will be adhered to by the organization. Documentation of our data processing activities and regular reviews will be undertaken to ensure compliance.

2. Data Collection and Processing

2.1. Consent: Where required by law, explicit and informed consent from individuals will be obtained before collecting and processing their personal data. Consent may be obtained through written forms, online mechanisms, or other appropriate means.

2.2. Purpose Notification: Individuals will be informed of the purposes for which their data is being collected and processed. This information will be provided in a concise, transparent, and easily accessible manner.

2.3. Sensitive Data: Special categories of personal data, such as health information or information revealing racial or ethnic origin, will only be collected and processed with explicit consent or where permitted by applicable law.

2.4. Data Sharing: Personal data will only be shared with third parties if necessary for the specified purposes and with appropriate safeguards in place. Data sharing agreements will be established to ensure compliance with data protection requirements.

3. Data Security

3.1. Data Access: Access to personal data will be limited to authorized personnel who require it for legitimate purposes. Access controls and user permissions will be implemented to prevent unauthorized access.

3.2. Data Encryption: Personal data stored electronically will be protected through encryption techniques to ensure its confidentiality and integrity.

3.3. Data Breach Response: In the event of a data breach or security incident, there are procedures in place to detect, assess, and respond promptly.

4. Data Subject Rights

4.1. Access and Rectification: Individuals have the right to request access to their personal data and to rectify any inaccuracies. Requests should be addressed to the designated contact person.

4.2. Erasure and Restriction: Individuals have the right to request the removal or restriction of their personal data. These requests will be accessed on the basis of legal requirements and will be responded accordingly.

4.3. Complaints: Individuals have the right to lodge complaints with the relevant data protection authorities. We will provide assistance and cooperate with such authorities in the resolution of complaints.

By adhering to this Data Protection Policy, Aseema demonstrates its commitment to protecting the privacy and confidentiality of personal data in line with applicable data protection laws and regulations.

TRAINING:

All employees, volunteers, and parties dealing with Aseema will receive training on this Data Protection Policy and their responsibilities for protecting personal data. Regular awareness programs and updates will be conducted to ensure ongoing compliance.

REVIEW:

This Data Protection Policy will be reviewed and updated periodically to reflect changes in legal and regulatory requirements or organizational practices. Any updates will be communicated to relevant stakeholders.