

DATA PROTECTION & PRIVACY POLICY

This Data Protection & Privacy Policy (“**Data Protection & privacy Policy**”) is published in compliance with inter alia:

- Section 43A of the Information Technology Act, 2000 (“**IT Act**”);
- Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**SPDI Rules**”);
- Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011; and
- Aadhaar [Targeted Delivery of Financial and other Subsidies, Benefits and Services] Act, 2016.

1. Objective

The purpose of this policy is to maintain & protect the privacy of and protect the personal information of employees, contractors, vendors, interns, associates, customers and business partners of Population Council Consulting Pvt. Ltd. (“**PCC**”) and ensure compliance with afore-mentioned laws and regulations as applicable.

2. Principles

Following principles shall govern the protection and appropriate use of Information at PCC:

- **Notice:** PCC shall provide data subjects with notice about how it collects, uses, retains, and discloses Information.
- **Choice and Consent:** PCC shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.
- **Rights of Data subject:** PCC shall provide individuals with the right to control their personal information, which includes the right to access, modify, or object to certain uses of their information and for withdrawal of earlier given consent.
- **Collection:** PCC shall collect personal information from data subjects only for the purposes identified.
- **Use, Retention and Disposal:** PCC shall not retain personal information longer than is necessary.
- **Security:** PCC shall protect Information from unauthorized access, leakage and misuse.

3. Definitions

Data Subject: All individuals whose personal information is either collected, received, processed, stored, dealt or handled by PCC.

Information: Personal Information of a Data Subject collected by PCC under this Policy shall hereinafter be referred to as “Information”. Such Information includes, inter alia, Sensitive Personal Data or Information as defined under the Indian Information Technology Act, 2000 and the Aadhaar number and/or the biometric information associated with an Aadhaar number.

Personal Information: Any information about an individual (the data subject) which can be used to distinguish or trace an individual's identity; or any other information that is linked or linkable to an individual. Examples included but not limited to: Name, Address, Date of birth etc.

Sensitive Personal Information (SPI): Sensitive personal data means personal data consisting of information but not limited to the following attributes of the data subject:

- password;
- financial information such as bank account or credit card or debit card or other payment instrument details;
- physical, physiological and mental health condition;
- sexual orientation;
- medical records and history;
- genetic or biometric information;
- racial and ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- any detail relating to the above clauses as provided to body corporate for providing service; and
- any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise:

Provided that, any information that is freely available in public domain or furnished under the Right to Information Act, 2005 or any other law shall not be regarded as sensitive personal data or information for the purposes of these rules

Third-Party: Any individual or entity over which PCC does not have any control or ownership, and which operates independently on its own is hereinafter referred to as a "Third Party"

4. Scope

This Policy is also intended to inform the Data Subject on how PCC collects, processes, stores, and uses personal information that a Data Subject provides to PCC either directly or indirectly. This Privacy Policy also covers PCC's treatment of any Information that Third Parties share with PCC. This policy is applicable to all PCC's employees, contractors, vendors, interns, associates, customers and business partners who may have access to Information collected or processed, or who provide information to the PCC. Everyone associated with PCC, and having access to personal information, is expected to read, understand and comply with this Policy.

5. How PCC Collects Data Subject's Information

PCC collects Information about Data Subject through the following means: (a) whenever a Data Subject shows an interest or elects to use PCC's services; (b) through PCC's network of agents and Third Party which collects such Information and transfers it to PCC; (c) when Data Subject, which

also includes employees of PCC, directly elects to share their Information with PCC and (d) when PCC engages in field research or study. Before requesting a Data Subject for consent, PCC shall give a notice in clear and plain language containing a description of personal data sought to be collected by PCC and the purpose of processing such personal data.

6. Why PCC Collects Data Subject Information

PCC uses the Information to conduct its business and to provide services. PCC will only use the Information based on this Policy, its understanding with the Data Subject, or as required by law. PCC will collect adequate, relevant and necessary Information and will process such Information fairly and lawfully for the purpose it is collected. Most commonly, PCC will use the Information in the following circumstances: (a) Where PCC needs to perform the obligations it has promised the Data Subject, such as to provide a service or product to the Data Subject and to enable the Data Subject's use of PCC's products/services; (b) Where PCC needs to comply with a legal, accounting, business or reporting obligation, including compliance with requests from the Government of India or any Governmental Agency; (c) To provide statistical information and when it is essential to provide services. By providing his or her Information, the Data Subject agrees that PCC may collect, use and share this Information with Third Parties for the purposes mentioned above.

7. Consent

Upon receipt of notice, the Data Subject shall provide consent for use of Information in accordance with this Policy. Data Subject agrees that PCC does not need any additional or further consent from him/her to use the Data Subject's Information in accordance with this Policy to carry out PCC's obligations or exercise specific rights.

8. Information Sharing and Disclosure

PCC may share Data Subject's Information with its Affiliates where we need to do so in order to provide the services. PCC may share the Information for the (i) purposes of IT support and maintenance, or (ii) internal governance and administration; or (iii) if you consent to us doing so, (iv) to comply with our legal or regulatory obligations. PCC may also disclose the Information to any of its agents or Third Parties insofar as reasonably necessary for the purposes set out in this Policy and for the purpose of providing services. Such Agents and Third Parties are expected to provide a similar level of protection to the Information as is adhered to by PCC. In addition to this, PCC may disclose the Information where it is required to do so by law or to Governmental Agencies. PCC may share Data Subject's information with the vendors, which include (i) delivery of our products (e.g., couriers) (ii) website hoisting and maintenance, (iii) IT services and solutions. PCC may also share Data Subject's information with its accountants, auditors, lawyers or other professional advisers or investors and other relevant third parties. PCC shall not use or disclose Information for purposes other than as mentioned in this policy, except with the consent.

9. Transfer of Information outside India

Unless stated otherwise, PCC stores and processes the Information in India. There may, however, be

occasions when PCC needs to transfer the Information outside India for its business requirements. In such instances, PCC shall comply with applicable laws in relation to the transfer of information outside India and will exercise the same level of care in handling the Information as it does in India.

10. Data Security

The Information is processed by PCC in strict accordance with the Indian Information Technology Act, 2000, and the rules notified thereunder. PCC implements and maintain 'Reasonable Security Practices and Procedures' as stated in the Indian Information Technology Act, 2000, the Information Technology [Reasonable Security Practices and Procedures and Sensitive Personal Data or Information] Rules, 2011 and Aadhaar [Targeted Delivery of Financial and other Subsidies, Benefits and Services] Act, 2016., while processing, collecting, storing or handling any Information.

11. Data Retention

PCC will only retain the Information for as long as necessary to fulfil the purposes PCC collected it for, including for the purposes of satisfying any legal, business, accounting, or reporting requirements. In some circumstances, PCC may anonymise the Information so that it can no longer be associated with the Data Subject, in which case PCC may use such information without a further reference to Data Subject.

12. Details about person handling and retaining the information

Details about the primary entity which handles and retains the Information is provided below: Population Council Consulting Pvt. Ltd. having its registered office at: B21,LG Floor, Jangpura Extn. New Delhi 110014.

13. Data Subject's Rights

Data Subject is entitled to certain data protection rights. The rights available to the Data Subject are as below:

- The right to rectification – Data Subject can contact PCC, through the Grievance Officer notified from time to time, requesting access to Data Subject's Information for reviewing or requesting amendment to certain information that Data Subject considers to be incorrect or wrong. PCC shall process such requests from Data Subject in accordance with applicable law.
- The right to withdraw consent – Data Subject may at any time revoke or withdraw Data Subject's consent to provide Information to PCC by contacting the notified Grievance Officer. Upon receipt of notice of withdrawal of consent from Data Subject, PCC shall within a reasonable time, cease to process the personal data of such Data Subject unless such processing of data/ information is required or authorised under law. PCC shall not be held liable in any manner whatsoever if it is unable to perform its services or if there is a deficiency in its services to Data Subject due to Data Subject's withdrawal of consent.

- Additionally, the Data Subject has the right to obtain following information viz. (i) confirmation of data/ information of Data Subject is processed, a summary of the personal data/ information that is processed, identification of all persons with whom the data/ information has been shared along with data/ information shared.
- The Data Subject shall have the right to nominate any other individual, who shall, in the event of death or incapacity of the Data Subject exercise the rights of Data Subject under this Policy.

14. Duties of Data Subject

- The Data Subject shall comply with the provisions of the applicable laws while exercising rights under this Policy.
- The Data Subject shall not register a false or frivolous complaint.
- The Data Subject shall, under no circumstances including while applying for any document, service, unique identifier, proof of identity or proof of address, furnish any false particulars or suppress any material information or impersonate another person.

15. Duties of PCC

- PCC shall make reasonable efforts to ensure that personal data processed by or on its behalf is accurate and complete.
- PCC shall implement appropriate technical and organizational measures to ensure effective adherence with Data Protection laws.
- PCC shall protect personal data in its possession or under its control by taking reasonable security safeguards.
- PCC shall, before processing any personal data/ information of a child, obtain verifiable parental consent.

16. Changes to this Privacy Policy

The Policy is subject to modifications from time to time. If PCC decides to change this Policy, PCC shall publish the modified Policy on its website.

17. Compliance Review

An internal audit committee shall be constituted to conduct an internal audit annually to ensure compliance with the established privacy policies and applicable laws as amended from time to time. The internal audit shall consist of the review of the following:

- personal information collected from data subjects;
- the purposes of the data collection and processing;
- the actual uses of the data;
- disclosures made about the purposes of the collection and use of such data;
- any legal obligations regarding the collection and processing of such data, and
- the scope, sufficiency, and implementation status of security measures.

The Internal Audit team shall document all the instances of non-compliance with privacy policies and procedures and report the same to the Grievance Officer. The Grievance Officer shall take actions on the findings from the internal audit and work on the recommendations for improvement of the privacy policy. Any changes made to the policies shall be communicated to all the employees, the stakeholders and the customers / clients.

18. Inquiries

PCC respects and is sensitive to the rights as granted in the data protection laws. Should Data Subject have questions about this Policy or PCC's information collection, use and disclosure practices, Data Subject may contact the Managing Director of PCC who shall act as the Grievance Officer. PCC will use reasonable efforts to respond promptly to requests, questions or concerns Data Subject may have regarding the use of Information.