



DATA PROTECTION POLICY

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| INTRODUCTION | |
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| OUR ORGANISATION | Ghaswala Vision Foundation (“ GVF ”) is a charitable trust established in 2002 which collaborates with not for profit organisations, corporate(s), hospitals, and doctors to provide aid to people from under privileged sections of society suffering from visual impairments, across India. |
| AIM OF POLICY | This data protection policy (“ Policy ”) sets out our commitment to ensure that any data, including any special category of data, which GVF collects, possess or processes, is carried out in compliance with the data protection laws and practices applicable in India. |
| SCOPE | This Policy is applicable to all patients, employees, affiliates and third parties who have given their data to GVF. Data herein includes (but is not limited to): <ul style="list-style-type: none">• Personal information (including your name, age, gender, address, contact number);• Medical information (including information about your physical, physiological and mental health condition, as provided by you and your assigned health care professional);• Financial information(including your annual income);• Any other data that seems necessary to us. |
| OPERATION OF POLICY | This Policy will be operational from 01/08/2019 and will be reviewed after every 3 years. Any amendments made to this Policy will be notified to you immediately. The latest version of this Policy is available at www.ghaswalafoundation.org . |



| PRINCIPLES AND RIGHTS | |
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| PRINCIPLES FOR PROCESSING DATA | <ul style="list-style-type: none">• Lawfulness, fairness and transparency: Data must be handled lawfully, fairly and in a transparent manner.• Purpose: Data must only be collected for specified and legitimate purposes.• Accuracy: Data must be accurate and updated. Reasonable steps must be taken to ensure that inaccurate data is erased or rectified without delay.• Deletion: Data which is no longer needed by us must be deleted.• Integrity and confidentiality: Data must be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing of the same. |
| RIGHTS OF PATIENTS AND EMPLOYEES RIGHTS | <ul style="list-style-type: none">• You have a right to request for information about the purpose for which your data is collected, how the same would be stored and processed.• You have a right to know the identity of the third parties to whom your data is transmitted.• You have the right to correct your data.• You have a right to object to the usage of your data for advertising and/or market research.• You have right to demand the deletion of your data after the purpose for which it was collected ceases to apply.• You have a right to be informed and to give your express consent when your sensitive data (including but not limited to financial information and medical information) is processed by us.• You have the right to be informed and check the automated processing of your data.• You have a right to receive a copy of all your data collected by us.• You have a right to file a complaint with our Grievance Officer regarding any queries/complaints you have towards the collection, possession and processing of data. |



| OUR RESPONSIBILITIES | |
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| PROCEDURE TO BE FOLLOWED | <ul style="list-style-type: none">• We will ensure that the basis for processing data is identified in advance and that all processing complies with the applicable law.• Only data that is needed and whose purpose was identified in advance will be collected.• We will not deal with data in a manner which is inconsistent with this Policy and/or privacy notice(s) and/or consent form(s).• We will ensure that the appropriate privacy notice is given when we collect data for advertising.• We will ensure that the appropriate consent form is given when collecting medical and financial information.• We will inform the Grievance Officer when sensitive data is being collected, stored, processed, transmitted or being dealt with in any other way.• As far as possible, we will keep data up to date.• We will keep data only for as long as it is necessary. After 15 years, if the data is found unnecessary we will delete the same.• We will ensure that the employees, affiliates and third parties of GVF are sufficiently trained to collect, process and possess data.• We will ensure that appropriate security measures are in place so that data can only be accessed by those who need to access it and that it is held and transferred securely.• Breach of this Policy by any employee, affiliate or third party may result in disciplinary action for misconduct, including dismissal or discontinuation of commercial ties, as the case may be. |
| GRIEVANCE OFFICER | <ul style="list-style-type: none">• The Grievance Officer is an independent professional who supervises the compliance of this Policy.• You can approach the Grievance Officer at any time to raise concerns or request for information relating to data protection issues.• The requests raised will be handled confidentially by the Grievance Officer.• Contact details: Name: Ambuj Mathur Phone Number: 9969187720 Email: ambuj@ghaswalafoundation.org |



| SECURITY | |
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| TRANSMISSION OF DATA | <ul style="list-style-type: none">• If data is transmitted to a third party it must be ensured that the data is only used for the intended purpose.• Transmission of data would happen only after you have authorised the same.• If data is transmitted to a third country, it will be ensured that this country maintains a data protection level which is equivalent to this Policy. |
| CONFIDENTIALITY | <ul style="list-style-type: none">• Any unauthorized collection, possession, or processing of data by employee, affiliates and third parties is prohibited. Employees, affiliates and third parties will have access to information on a 'need to know' basis.• Employees, affiliates and third parties are forbidden from using personal data for private or commercial purposes, to disclose it to unauthorized persons, or to make it available in any other way. |
| PROCESSING SECURITY | Data will be safeguarded against unauthorized access and unlawful processing or disclosure, as well as accidental loss, modification or destruction. This applies regardless of whether data is processed electronically or in paper form. Before the introduction of new methods of data processing, particularly new information technologiesystems, sufficient measureswill be taken to protect data. |
| CONTRACT DATA PROCESSING | Contract data processing means that a provider is hired only to process data. In such a situation GVF will ensure the following: <ul style="list-style-type: none">• That a suitable service provider is hired;• That instructions for processing data are documented;• That the• contract with the service provider is reviewed by the Grievance Officer;• That periodic and regular reviews of the service provider undertaken. |
| DATA PROTECTION INCIDENTS | All employees, affiliates and third parties must inform the Grievance Officer immediately about cases of violation of this Policy. |