

## Navneet Foundation Data Protection and Privacy Policy

### 1. Purpose

Navneet Foundation is committed to upholding the privacy, dignity, and rights of all individuals—especially children, women, and vulnerable communities—in its work across education, healthcare, community development, and environmental sustainability. This policy ensures responsible data collection, use, and protection in line with the **Digital Personal Data Protection Act (DPDPA), 2023**.

### 2. Scope

This policy applies to all employees, volunteers, consultants, and partners of Navneet Foundation. It covers personal data collected through any means—including paper-based forms, digital systems, apps, photographs, video, voice recordings, learning assessments, intervention manuals, and teaching materials. It also governs the use of data in training, on-boarding, communications, reporting, and research.

### 3. Key Data Protection Principles

- **Consent-Based Collection:** Data will be collected only with **free, informed, and voluntary consent** from individuals (or guardians in case of minors), as required by DPDPA 2023.
- **Purpose Limitation:** Data will be collected only for specified and lawful purposes related to program delivery, impact measurement, training, or content development.
- **Data Minimization:** Only the minimum data required will be collected—no excess or irrelevant personal information.
- **Storage and Security:** Data will be stored securely—physical records in locked cabinets; digital files protected by passwords, encryption, and access control.
- **Accuracy and Retention:** Records will be kept accurate and updated; data will not be retained longer than necessary.
- **Limited Access:** Only authorized personnel can access personal data. Data access is role-specific and periodically reviewed.

### 4. Use in Program Material

- **Teaching Materials & Manuals:** Any use of real-life data, photos, or case studies in educational or intervention manuals must have prior written consent and must **anonymize identities**, especially of children.
- **Training and On-boarding:** All new staff, interns, and volunteers will receive mandatory training on data protection responsibilities, including safe handling of child data, health data, and community profiles.

- **Media & Reports:** Photos, videos, or quotes used in reports, websites, or media must follow strict consent protocols and not compromise individual identity without explicit permission.

## 5. Rights of Individuals (Data Principals)

In line with DPDPA 2023, every person whose data is collected has the right to:

- Know what data is being collected and why
- Request access, correction, or deletion of their data
- Withdraw consent at any time
- File a grievance for misuse or breach of their data

## 6. Roles and Responsibilities

- **All Staff and Partners** must follow this policy in all program and communication activities.
- **Program Managers and Trainers** must ensure consent procedures and data protocols are followed in manuals, teaching aids, and field training.
- **Data Protection Officer (or equivalent)** is responsible for compliance monitoring, training, addressing grievances, and ensuring alignment with DPDPA 2023.

## 7. Data Breach Protocol

Any data breach or suspected misuse of data or information shall be reported forthwith to the designated Data Protection Officer, Ms. Mayuri Mistry. In the event that such breach or misuse pertains to, or is alleged against, the said Officer, the matter shall be reported to Mr. Gnanesh Gala, Trustee, Navneet Foundation. An internal review will be conducted, and where necessary, affected individuals and authorities will be informed, as per legal requirements.

## 8. Review and Compliance

This policy will be reviewed annually or earlier if required by changes in law or organizational needs. Compliance is mandatory and any violation will result in disciplinary action.

This policy has been approved by trustees of Navneet Foundation at its meeting held on 29<sup>th</sup> August, 2025.