

## **PRIVACY POLICY**

This is the privacy policy of the Abhinava Global Academy State ranch (referred to as Abhinava Global Academy “we”, “us” or “our” in this privacy policy). This privacy policy will inform you as to how we handle your personal data when you visit our website and tell you about your privacy rights.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **PURPOSE OF THIS PRIVACY POLICY**

This privacy policy aims to give you information on how Abhinava Global Academy collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to register/join, our register for an Event, and/or sign up for any other event through our website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them. For example, if you register for an event, this privacy policy supplements any notice you may receive in connection with that registration. Individuals located in the India may have additional rights that are not available to individuals in other geographic locations, and we ask that you please read carefully this policy.

#### **CONTROLLER**

If you are an individual located in the India, Abhinava Global Academy is the controller and responsible for your personal data collected through the website. This Privacy Policy only applies to data as to which Abhinava Global Academy is a controller.

We have appointed our Executive Director to be responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Executive Director using the details set out below.

## **CONTACT DETAILS**

Abhinava Global Academy

Addressee: #209, Heritage Street Banashankari, 6th Stage, 6th Block, Bangalore - 560062

Email address: [info@abhinavaglobalacademy.com](mailto:info@abhinavaglobalacademy.com)

If you are an individual located in the India, in the event of a dispute, you may have the right to make a complaint with your local authorities. We would, however, appreciate the chance to deal with your concerns first because your privacy is important to us.

## **CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on the date first set forth above. Historic versions can be obtained by contacting our president.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, if applicable.

## **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and/or applications, including those of our affiliates. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **1. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which may include the following categories follows:

Identity Data includes first name, last name, username or similar identifier, and title.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Transaction Data includes details about services you have obtained from us, including registrations.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data includes your username and password, registrations, and sign-ups by you.

Usage Data includes information about how you use our website and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences (including as to the Mail Sign Up).

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Do not share any Special Categories of Personal Data with us.

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to allow you to register for an event). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **1. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by mail, phone, email or otherwise. This includes personal data you provide when you:

register for an event, etc.;

create an account on our website;

subscribe to one of our interest groups; or

give us some feedback (when you Contact Us).

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.

Third parties or publicly available sources. We do not collect information about you from third parties.

## **1. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data in order to carry out our mission as a non-profit organization. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you, such as our obligations to you in connection with your rights as to events, for example.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data because we do not send third party marketing communications. In any event, if we send you any communications, you will have the opportunity to Opt-Out.

### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the Executive Director if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity

Type of data

Lawful basis for processing including basis of legitimate interest

To register you as a new member

(a) Identity

(b) Contact

Performance of a contract with you

To process and deliver your membership activities (events, etc.), including:

(a) Manage payments, fees and charges

(b) Collect and recover money owed to us

(a) Identity

(b) Contact

(d) Transaction

(e) Marketing and Communications

(a) Performance of a contract with you

(b) Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which will include:

(a) Notifying you about changes to our policies or terms of service

(a) Identity

(b) Contact

(c) Profile

(d) Marketing and Communications

(a) Performance of a contract with you

(b) Necessary to comply with a legal obligation

(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To administer and protect our operations and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(a) Identity

(b) Contact

(c) Technical

(a) Necessary for our legitimate interests (for running our operation, provision of administration and IT services, network security, to prevent fraud etc.)

(b) Necessary to comply with a legal obligation

To use data analytics to improve our website and visitor experiences

(a) Technical

## (b) Usage

Necessary for our legitimate interests (to keep our website updated and relevant)

## **MARKETING**

All marketing to members is done in connection with the members' membership opportunities (events, etc.) and each member will have the opportunity to Opt-Out from such marketing.

If we market to non-members, we will do so only upon receiving consent from such non-members and in accordance with applicable privacy laws. In any event, non-members will have the opportunity to Opt-Out from such marketing.

## **THIRD-PARTY MARKETING**

We do not generally share your personal data with any company outside Abhinava Global Academy for marketing purposes. If we ever do share your personal data with a third party for the third party's own marketing purposes, we will obtain your prior consent before we do so.

## **OPTING OUT**

You can ask us to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting the President. Please allow a reasonable time for us to respond to your request.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your status as a member, or a registrant for an event or other transactions.

## **COOKIES**



A cookie is a small text file that can be stored on your computer when you visit websites. Information is saved in this text file to ensure a smooth and interactive experience on the internet. Cookies usually also have an expiration date. For example, some cookies are automatically deleted when you close your browser (so-called session cookies), while others can be stored longer on your computer, sometimes until you delete them manually (so-called permanent cookies).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the President.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **1. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data for the purposes set out in the table in Paragraph 4 above, as follows:

Service providers, acting as processors, based in the India who provide IT and system administration services.

Professional advisers, acting as processors or joint controllers, including lawyers, auditors and insurers based in India who provide consultancy, legal, and insurance services.

State government agencies, regulators and other authorities, who may require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6.. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **1. DATA RETENTION**

#### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of

harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we may have to keep basic information about our members (including contact, identity, and transaction data) for up to seven years after they cease being members (for tax purposes.)

In some circumstances, you can ask us to delete your data: see Request erasure below for further information.

## **1. YOUR LEGAL RIGHTS**

This paragraph applies to individuals located in the India only. Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data.

Request correction of your personal data.

Request erasure of your personal data.

Object to processing of your personal data].

Request restriction of processing your personal data.

Request transfer of your personal data.

Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact our President.

**NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **1. GLOSSARY**

### **LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our President.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **YOUR LEGAL RIGHTS**

If you are an individual located in the India, you may have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have

compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.