



The Commonwealth Students' Welfare Group of India



A BRANCH OF
THE ROYAL COMMONWEALTH SOCIETY

PRIVACY POLICY

1. INTRODUCTION AND CONTACT DETAILS

1.1 This website is fully owned, designed and maintained by **the Commonwealth Students' Welfare Group of India** hereafter referred to as **The CSWGI or CSWGI**. We are committed to safeguarding the privacy of our website visitors and service users. If you are using this site, it will be deemed that you agree to our Terms of Use Policy available on this site. The moment you start using this website, it will be considered that you are legally bound to our terms & conditions and the information available on the site could be modified and updated time to time. If you do not want to get bound by our terms and conditions, you may not use this site but if wish, you must provide accurate and complete ordering and registration details that contain your name, address and other requested details.

1.2 In this policy "we", "us", "our" refer to the Commonwealth Students' Welfare Group of India. All the terms such as "We", "Our" and "Us" will be associated to The CSWGI and our Terms of Use policy of this site (<https://www.thecswgi.org/>).

1.3 For the purpose of the Information Technology Act, 2000 ("the IT Act"), in respect of any personal data that you submit or that is collected from you or about you, the data controller is the Commonwealth Students' Welfare Group of India which is a registered charity in India.

1.4 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

1.5 Our website incorporates privacy controls, which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

1.6 Terms defined in the Terms of Use shall have the same meaning when used in this Privacy Policy.

1.7 If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy please contact our data protection officer with the following contact information:

D-183, SARITA VIHAR, NEW DELHI 110076 (INDIA)

T: +91 11 41013126, +91 11 26941001 | E: THECSWGI@GMAIL.COM, PRESIDENT.CSWGI@GMAIL.COM



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Postal address:

**Commonwealth Students' Welfare Group of India, D 183, Pocket D, Sarita Vihar, New Delhi
110076, INDIA**

Email address: thecswgi@gmail.com

2. INFORMATION THAT WE COLLECT ABOUT YOU

The types of personal information that we collect about you may include:

- Your title, name, gender, nationality and date of birth;
 - Your contact details (address, email, phone number and social media contact details);
 - Family and spouse/partner details; relationships to other supporters;
 - Your professional activities and employment details;
 - Current interests and activities;
 - Gift aid status and records of donations;
 - Contact preferences;
 - Your IP address, location, browser type and information on how you interact on our website;
- and

Any other information provided by yourself at our request.

3. SOURCES OF INFORMATION COLLECTED ABOUT YOU

3.1 We may collect information about you from third parties, from the public domain or information that you provide when you use the Site, when you make a donation if you consent to receiving contact from us, if you subscribe to any of our newsletters as they may exist from time to time or if you contact us for any reason.

Information you give us

3.2 When you make a donation through the Commonwealth Students' Welfare Group of India website, the information you will be asked to enter will include some or all of the following:

- Your name;
- Your address;
- Your account number or other payment details;
- Your mobile or other phone numbers;
- Your email address;

3.3 We will also collect personal information about you that is contained in any correspondence that you send to us. For example, if you contact us, we may keep a record of that

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correspondence by reference to your name or address. We may also ask you for information when you report a problem with the Site or with anything contained on the Site.

Information from Third Parties

3.4 We may collect generic information about your visits to and how you use the Site. We may therefore collect information such as your IP addresses, geographical location, browser type, referral source, length of visit and number of page views. Individual users will not be identifiable from this information and we may use this information for a number of purposes including website administration, optimising the use of the Site, disclosing to third party contributors or for security purposes. In particular, we may use an analytics service provider for website traffic analysis and reporting and to track information such as which browser, screen resolution and IP address you are using to access the Site, in addition to tracking your movements around the Site. Information in the public domain.

3.5 We may obtain some information from publicly available resources such as Companies House, newspaper articles or open postings on social media.

4. HOW WE USE YOUR INFORMATION

4.1 We will use your information for the following purposes:

- To ensure that content from the Site is presented in the most effective manner for you and for your computer.
- To enable us to provide you with any email updates or newsletters that you may have subscribed to from time to time.
- To provide customer service in relation to your use of the Site and your donations, to contact you, to deal with enquiries and complaints relating to the use of the Site and to notify you about changes to any services.
- To administer your donation or support our fundraising.
- To invite you to events.
- To notify you of competition updates.
- To send you hard copy of in-house publications.
- To keep a record of your relationship with us and record the contact we have had with you.
- To ensure we know how you prefer to be contacted.
- To internally monitor usage of the Site so as to enable us to improve the Site.
- To provide third parties with statistical information about our users but this information will not be able to be used to identify any individual user.

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4.2 Tools may be used to improve the effectiveness of our communications with you, including tracking whether you open the emails we send you and which links you click within a message.

4.3 We may also use personal information to carry out due diligence so that we are fundraising in accordance with the law, and our own internal policies and procedures.

5. LEGITIMATE INTERESTS

5.1 The law allows personal data to be collected and used by an organisation if it is necessary for the legitimate business interests of the organisation. In broad terms, our 'legitimate interests' mean our interests in being able to run the Commonwealth Students' Welfare Group of India as a charitable entity effectively in pursuit of our objectives, provided that what the information is used for is fair and does not unduly impact the rights of the individual concerned.

5.2 The following are some of the examples of when and why we would use this approach to our work:

-Direct Marketing: We may send postal marketing and fundraising requests which further the aims and objectives of the Commonwealth Students' Welfare Group of India and don't unduly impact the rights of the individual.

-Profiling and analysing information: We carry out limited profiling and research to help us understand our donors and potential donors, including gathering information from publicly available resources to give an insight into philanthropic interests and ability to support the Commonwealth Students' Welfare Group of India (see below for more details).

5.3 Profiling and analysing information of our supporters:

In order to tailor what type and level of support we ask you for, we may analyse personal information we collect about you including how you have engaged with us previously, demographic information, measures of affluence, philanthropic interests and networks.

We may also use information in the public domain, for example listed Directorships or typical earnings in a given area.

You can opt out of your data being used for profiling and wealth screening techniques by contacting the Data Protection Officer (email to: thecswgi@gmail.com).

6. DISCLOSURE OF YOUR INFORMATION

6.1 Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent.

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6.2 We may disclose your personal data to our affiliate organisation: the Royal Commonwealth Society, London hereafter "RCS" and other sister concern branches of the RCS, specifically those that operate in the region or country in which you reside identified at <https://www.royalcwsociety.org/pages/category/find-your-local-branch> insofar as reasonably necessary to deliver specific programmes and events (such as local award ceremonies for RCS competitions (The Queen's Commonwealth Essay Competition) etc.

6.3 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6.4 In addition to the specific disclosures of personal data set out in this Section 6, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6.5 your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behavior of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

- Your data will be made available to our website provider.
- The data that may be available to them include any of the data we collect as described in this policy.
- Our website provider will not transfer your data to any other third party.
- This processing does not affect your rights as detailed in this privacy policy.

7. THIRD PARTY CONTENT, SITES AND CONTRIBUTORS

7.1 The Site may contain content and links to websites and microsites that are operated by third parties. In addition, any advertisements contained on the Site may operate as links to that

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advertiser's websites, and advertisers and third parties may also use and place cookies on your computer.

7.2 We do not control and accept no liability or responsibility for these third party websites and microsites nor for the third party content, advertisements and cookies. This Privacy Policy does not apply to such websites, microsites, content, advertisements and cookies and any information they collect by virtue of you clicking on that link will be collected and used in accordance with the privacy policy of that third party. Please therefore consult the terms and conditions and privacy policy of those third party websites and microsites to find out how they collect and use your personal data and to establish whether and for what purpose they use cookies.

7.3 We make no presentations if you are accessing other website through our website or may find them linked to our website. If you are having one, you may understand that it is independent from us and beyond our control in terms of the content or availability of site. In addition to this, any site linked to our site does not mean that we accept or endorse its responsibility of content rather any concern regarding such websites should be associated to its website administrator or web master.

7.4 If you have any queries or complaints in relation to such third party sites, content, advertisements and/or links which feature or can be accessed via the Site, please contact us (please see section 1). We will try our best to assist with your queries and complaints although please note that we may not be the data controller in respect of the data that you submitted or is collected via such third party sites therefore we may not be able to do anything.

8. SECURITY AND DATA RETENTION

8.1 We and all third parties that process personal data on our behalf employ reasonable security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will retain your information for a reasonable period in order to achieve or facilitate the purposes described above or as long as the law requires or permits.

8.2 We, or our data processors on our behalf, will store all the personal information, including your login and user details (where applicable), on our secure servers.

8.3 All electronic transactions that you make via the Site and that are processed by our third party payment service provider will be encrypted using industry standard encryption technology.

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This technology will encrypt all of your credit card numbers so that they cannot be read as the information travels over the internet.

8.4 Notwithstanding clause 8.3 above, data transmission over the internet is inherently insecure and susceptible to unauthorised access and interception, and we cannot guarantee the security of data sent over the internet.

8.5 Notwithstanding the other provisions of this Section 8, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests or another natural person.

9. INTERNATIONAL DATA TRANSFERS

9.1. In this Section 9, we provide information about the circumstances in which your personal data may be transferred to other countries.

9.2. We are a part of the Royal Commonwealth Society's international network of branches (independent organisations) in Australia, Bangladesh, Barbados, Belgium, Cameroon, Canada, the Cayman Islands, Cyprus, Fiji, Finland, Ghana, Gibraltar, Guernsey, Hong Kong, Ireland, Italy, Jamaica, Japan, Jersey, Kenya, Malaysia, Malta, Mauritius, New Zealand, Nigeria, Pakistan, Singapore, Sri Lanka, Switzerland, Trinidad & Tobago, Uganda, United Kingdom and the United States of America. Appropriate safeguards will protect transfers to each of these countries, namely the use of a data sharing agreeing between them and us. Personal data will only be shared with these organisations with your consent and if the branch has signed and returned their data sharing agreement, a copy of which can be obtained from the data protection officer.

9.3. You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use or misuse of such personal data by others.

10. YOUR RIGHTS

10.1 You are entitled to know what personal data we hold about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us using the information provided above.

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10.2 You may request us to cease sending you any correspondence, email updates and newsletters at any time by notifying us in writing or following any “unsubscribe” instructions if included in any email sent to you.

10.3 If you have received unwanted, unsolicited emails sent via this system or purporting to be sent via this system, please forward a copy of that email with your comments to thecswgi@gmail.com for review.

10.4 Please let us know if the personal information which we hold about you needs to be corrected or updated at any time.

11. CHANGES TO OUR PRIVACY POLICY

We reserve the right to make changes to the Privacy Policy from time to time. Any such changes to our Privacy Policy will be posted to the Site and, where appropriate, through e-mail notification.

We ensure to make our website available but give no guarantee about its continuous operation or without interruptions and error free. You must not interfere with the proper working of our website along with its circumvent security or disrupt any computer system or interconnected device. We are committed to safeguard the privacy of our users and deserve our right to alter or suspend any aspect of website or content including your access.

This policy was last updated: 01/01/2021.

