

INTRODUCTION:

Welcome to the Privacy Policy of the Old Cottonians' Association (the OCA) at www.thecottonians.com . This is the official alumni page of Bishop Cotton Boys' School.

Presently in its 95th year, the OCA was originally called the Old Boys' Association, having been formed in 1927 by the then Warden Rev. A.E. Scipio. It was thereafter renamed the Old Cottonians' Association in ____, as it is fondly known today.

The OCA respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

You can download a pdf version of the policy here (***insert link***). Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

IMPORTANT INFORMATION AND WHO WE ARE:

1. Purpose of this privacy policy:

This privacy policy aims to give you information on how the OCA collects and processes your personal data through your use of this website, including any data you may provide through this website when you subscribe for services and/or make transactions.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 other notices and privacy policies and is not intended to override them and is being published in compliance with *inter alia*:

- i. Section 43(A) of the Information Technology Act, 2000

- ii. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPI Rules”);
- iii. Regulation 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

a) Controller:

thecottonians.com is the controller and responsible for your personal data (collectively referred to as ["The OCA"], "we", "us" or "our" in this Privacy Policy).

We have appointed a Data Protection Officer (DPO) or Data Privacy Manager (DPM) who is 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 (DPO/DPM) using the details set out below:

Contact details:

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity:

Email address:

Postal address:

Telephone number:

- b) Grievance Officer: In accordance with the Information Technology Act, 2000 and Section 5(9) of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and the name and contact details of the Grievance Officer are provided below:

Full name of legal entity:

Email address:

Postal address:

Telephone number:

You have the right to make a complaint at any time to the Grievance Officer. We would, however, appreciate the chance to deal with your concerns before you approach the Officer so, please contact us in the first instance.

- c) Changes to the privacy policy and your duty to inform us of changes: We keep our privacy policy under regular review. This version was last updated on *[insert date]*. Historic versions are archived here: *[insert link]* or can be obtained by contacting the DPO/DPM.

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.

- d) Third-party links: This website may include links to third-party websites, plug-ins and applications. 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.

2. Privacy Statement:

- a) A pre-requisite for each person's use of and access to thecottonians.com services is their acceptance of the Terms of Use which also involve the acceptance of the terms of this Privacy Policy. In the event you do not agree with any of the provisions of the same, you have the option to discontinue the Services provided by us immediately.
- b) All the information provided to us by a User, especially sensitive personal information is voluntary. You understand that The OCA, may use certain information of yours which has been designated as 'sensitive personal data or information' under the SPI Rules for:
- i. the purpose of providing you the Services

- ii. for commercial purposes and in an aggregated or non- personally identifiable form for research, statistical analysis and business intelligence purposes;
 - iii. for the sale or transfer of such research, statistical or intelligence data in an aggregated and/or non-personally identifiable form to our affiliates/partners. The OCA also reserves the right to use information provided by or about yourself for the following purposes:
 - publishing such information on the Website;
 - Contacting Users for offering new products or services;
 - Contacting Users for taking product and Service feedback;
 - Analysing software usage patterns for improving product design and utility;
 - Analysing anonymised information for commercial use.
- c) You hereby consent to such use of such information by The OCA and/or our Partners (if applicable)
- d) Collection of information which has been designated as ‘sensitive personal data or information’ under the SPI Rules requires your express consent. By affirming your acceptance of this Privacy Policy, you provide your consent to such collection as required under applicable law. Our Services may be unavailable to you in the event such consent is not given.
- e) Users’ personally identifiable information which they choose to provide on the Website **or App** is used to help the Users describe/identify themselves. Other information that does not personally identify the Users as an individual, is collected by The OCA from Users (such as, patterns of utilization described above) and is exclusively owned by The OCA. We may also use such information in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, and may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties. In particular, we reserve with us the right to use anonymized User demographics information and anonymized User health information for the following purposes:

- Analysing software usage patterns for improving product design and utility.
 - Analysing such information for research and development of new technologies.
 - Using analysis of such information in other commercial product offerings of The OCA.
 - Sharing analysis of such information with third parties for commercial use.
- f) You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of your registration. If your personal information changes, you may correct, delete inaccuracies, or amend information by making the change on your profile information page on the Websites or App or by contacting us at _____.
- We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or The OCA has reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, The OCA may, at its sole discretion, discontinue the provision of the Services to you.
- g) If you wish to cancel your account or request that we no longer use your information to provide you services, contact us through _____. We will retain your information for as long as your account with the Services is active and as needed to provide you our Services.
- h) We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. After a period of time, your data may be anonymized and aggregated, and then may be held by us as long as necessary for us to provide our Services

effectively or improve the Services, but our use of the anonymized data will be solely for analytic purposes.

3. The data we collect about you:

- a) 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).
- b) The services offered by The OCA require us to know who you are so as to enable us to best cater to your personal requirements. In order to access our services, we require you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you. Without prejudice to the generality of the above, the information collected by us from you may include, but is not limited to the following:
 - Data regarding your usage of the OCA's services and/or the history of transactions, appointments, meetings made with you during the usage of our Services.
 - Other information that you voluntarily choose to provide to us (such as information shared by you with us through emails or letters, your work details, your family details)

The information the OCA collects from you may constitute 'personal information' or 'sensitive personal data or information' under the SPI Rules. Personal information is defined under the SPI Rules to mean any information that relates to a natural person which either or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

The SPI Rules further define "sensitive personal data or information" of a person to mean personal information about that person relating to:

- Passwords
- financial information such as bank accounts, credit and debit card details or other payment instrument details;

- physical, physiological and mental health condition;
- sexual orientation;
- medical records and history;
- biometric information;
- information received by body corporate under lawful contract or otherwise;
- visitor details as provided at the time of registration or thereafter; and
- Call data records

Information that is freely available in the public domain or accessible under the Right to Information Act, 2005 or any other law will not be regarded as personal information or sensitive personal data or information.

c) We may collect, use, store and transfer other kinds of data about you which we have grouped together as follows:

- Identity Data includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- Contact Data includes [billing address, delivery address, email address and telephone numbers].
- Financial Data includes [bank account and payment card details].
- Transaction Data includes [details about payments to and from you and other details of products and services you have purchased from us].
- 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, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- Usage Data includes [information about how you use our website, products and services].

d) We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may

aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

- e) 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 have to cancel services you have with us but we will notify you if this is the case at the time.

4. How is your personal data collected?

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

- a) Direct interactions. You may give us your [Identity, Contact and Financial Data] by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you [***delete or add to this as applicable***]:
- apply for our products or services;
 - create an account on our website;
 - subscribe to our services; or
 - give us feedback or contact us.
- b) Automated technologies or interactions: As you interact with our website, we will 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. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [***link***] for further details.

c) Third parties or publicly available sources: We will receive personal data about you from various third parties and public sources as set out below [***delete or add to this list as appropriate***]:

- i. Technical Data from the following parties:
 - analytics providers such as Google based outside India;
 - advertising networks such as [_____] based inside or outside India; and
 - search information providers such as [_____] based inside or outside India.
- ii. Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as [_____] based inside or outside India.
- iii. Identity and Contact Data from data brokers or aggregators such as [_____] based inside or outside India.
- iv. Identity and Contact Data from publicly available sources inside and outside India.

[***ANY OTHER WAYS YOU COLLECT PERSONAL DATA***].

5. How we use your personal data:

We will only use your personal data when the law allows us to. 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.
- 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 obligation.

Click here [***link to glossary, lawful basis***] to find out more about the types of lawful basis that we will rely on to process your personal data and a tabular depiction of the legal basis and type of data collected for the same.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party

direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

{NOTE: thecottonians.com is not responsible/ liable for how third party(s) use the personal data shared with them}

a) Marketing & Promotional offers

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which programs may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or are attending our mentorship programs and have not opted out of receiving that marketing.

b) Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

a) 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 [***link to your cookie policy***].]

b) 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 us.

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.

6. Disclosures of your personal data:

- a) We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above:
 - Internal Third Parties as set out in the Glossary.
 - External Third Parties as set out in the Glossary.
- b) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- c) 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.
- d) International transfers:

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of India.

7. Data security:

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised 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.

8. Data retention:

a) How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 unauthorised 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, regulatory, tax, accounting or other requirements.

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 could refuse to comply with your request in these circumstances.

b) 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.

c) Time limit to respond:

We try to respond to all legitimate requests within one month. Occasionally it could 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.

9. **Casual Visitors Note:**

- a) No sensitive personal data or information is automatically collected by the OCA from any casual visitors of this website, who are merely perusing the site.
- b) Nevertheless, certain provisions of this Privacy Policy are applicable to even such casual visitors, and such casual visitors are also required to read and understand the privacy statements set out herein, failing which they are required to leave the Website immediately.
- c) If you, as a casual visitor, have browsed any page of this Website prior to reading the privacy statements set out herein, and you do not agree with them, normally quitting the browser should ordinarily clear any temporary cookies installed by the OCA. We, however, encourage you to use the “clear cookies” functionality of your browsers to ensure such clearing / deletion, as the OCA cannot guarantee, predict or provide for the behaviour of the equipment of all the visitors of the Website.
- d) You are not a casual visitor if you have willingly submitted any personal data or information to the OCA through any means, including email,

post or through the registration process on the Website. All such visitors will be deemed to be, and will be treated as, Users for the purposes of this Privacy Policy, and in which case, all the statements in this Privacy Policy apply to such persons.

10. Children And Minors Privacy:

- a) The OCA strongly encourages parents and guardians subscribed to the OCA to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission.
- b) The OCA is in no manner responsible for or liable towards any and all claims arising from unsupervised or unauthorised use of our website by a minor without parental supervision.

11. Consent to this Policy:

- a) You acknowledge that this Privacy Policy is a part of the Terms of Use of the Website and the other Services, and you unconditionally agree that becoming a User of the Website, the App and its Services signifies your assent to this Privacy Policy. Your visit to the Website, use of the App and use of the Services is subject to this Privacy Policy and the Terms of Use.

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 us.

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

Third Parties:

a) Internal Third Parties

- Other affiliates/subsidiaries/partners of The OCA [acting as joint controllers or processors] and who are based _____ and provide IT and system administration services and undertake leadership reporting].

b) External Third Parties

- Service providers acting as processors based in [_____] who provide IT and system administration services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in [_____] who provide [consultancy, banking, legal, insurance and accounting services].
- Revenue & Customs, regulators and other authorities acting as processors or joint controllers based India who require reporting of processing activities in certain circumstances.

[Details of any other third parties, for example, market researchers, fraud prevention agencies, price comparison sites and so on.]

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 us 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 user	(a) Identity (b) Contact	Performance of a contract with you This information may be collected when users submit an online form that we make available or send an email to us. It is used to contact a user interested in receiving information about our Site in general or our different programs in particular.
To provide our services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (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	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(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 business 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 business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

services that may be of interest to you	(f)Marketing and Communications	
Information Generated from Log Files (including information such as internet protocol (IP) addresses, type of browser, Internet Service Providers (ISP), date/time stamp, referring/exit pages, clicked pages, and any other information your browser may send to us)	a) Technical (b) Usage	We may use such information to analyze trends, administer the Site, track users' movement around the Site, and gather demographic information.
Data from Cookies	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f)Marketing and Communications	Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. "Cookies" are small text files that may be used, for example, to collect information about activity on the Site. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. This data is collected in order for us to provide our site and keep you logged in. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user

Site Usage Information from Google Analytics (including how often you visit the Site, what pages you visit within the Site, and what other sites you used prior to coming to this Site)	a) Technical (b) Usage	The information we receive from Google Analytics is used to maintain and improve the Site and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at http://www.google.com/analytics/terms/us.html , and the Google Privacy Policy, available at http://www.google.com/policies/privacy/
Personal Information of Others (Email Addresses, Third Party Website Account User Names/ID)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	This data is used in order to enable you to invite your friends to use our Site by sending them an invitation email or message. Inviting friends may be done by either using the Site to send or post an invitation message via your Third Party Account and/or by using the Site to send an invitation email to your friend's external email address (for example, a Gmail address).
Identity & Background Screenings	(a) Identity (b) Contact	Applicants for are required to provide personal information to verify eligibility, which is reviewed internally by the OCA team members to verify the same.

YOUR LEGAL RIGHTS

You have the right to:

1. 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.
2. 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.

3. 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.
4. 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. 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:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - 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.

