PRIVACY POLICY

Caring with Colour- A Manasi Kirloskar Initiative("**CWC**", "**we**", "**us**", "**our**") values your privacy and is committed to protecting your personal data.

This Privacy Policy ("**Privacy Policy/Policy**") describes what data we collect about you ("**User**" or "**your**" or "**you**") while you use or access the website https://www.caringwithcolour.org (https://www.caringwithcolour.org) (hereinafter referred to as **"the Website/Site"**) and/or the **"Teachopia"** app (hereinafter referred to as the "**Application/App**") (regardless of where you visit it from).

This Privacy Policy also explains why we collect this data, how we use your data, how we protect and share your data, the rights available to you under law [including the Digital Personal Data Protection Act, 2023] and the choices available to you, regarding the use, updation and deletion of your data.

1. Introduction

1.1. By browsing our Website and/or downloading and using our App and submitting information to us, you agree and consent to CWC and its authorised personnel and representatives collecting, using, disclosing and sharing amongst themselves your personal data, in the manner set forth in this Privacy Policy.

1.2. This Privacy Policy supplements but does not supersede any other consent you may have previously provided to CWC, nor does it affect any rights which CWC may have at law in connection with collection, use or disclosure of your personal data. CWC may from time to time update this Policy to ensure that it is consistent with our future developments, and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Privacy Policy as updated from time to time on the Website and/or App. Please check regularly for updated information on the handling of your personal data.

1.3. The Privacy Policy covers both 'online' interactions (e.g., the Site and/or App, however accessed and/or used, whether via personal computers, mobile devices or otherwise) and 'offline' interactions (e.g., collection of data through mailings, telephone, or at in-person workshops, training sessions or physical forms).

1.4. Please read and understand this Privacy Policy carefully, and its applicability to your usage of the Site and/or App. By accepting the Terms of the Site and App, you agree to the Terms of this Privacy Policy. Please review the following carefully so that you understand our privacy practices. If you do not agree to this Privacy Policy, do not accept the Terms, or use the Site or App. This Privacy Policy is incorporated by reference into the Terms of Use of the Site and App.

1.5. In the event you have any queries or need any clarifications about this Privacy Policy, you can contact us at itadmin@caringwithcolour.org

2. **Data we collect:**

There are three categories of data we collect:

2.1. Personally Identifiable Data

This is the information that tells us who you are and lets us identify, contact or locate you ("**Personally Identifiable Data**"). Personally Identifiable Information includes your name, telephone number, email address, date of birth [if you are downloading and using our app]

Neither the Website nor the App are designed to automatically collect your Personally Identifiable Data, without your knowledge or consent.

We collect your Personally Identifiable Data when you:

- â€¢ Register with us, either in person or through the App
- â€¢ Fill in forms, either in person or online, to register with us, contact us, book workshops or to download our materials
- â€¢ Reach out to us by email, phone calls, letters or otherwise with requests for us to conduct workshops for your schools, provide feedback or to correspond with us or otherwise volunteer information.
- â€¢ Provide your contact information on our Website or App, or through offline means
- â€¢ Download our App and create an account- We collect your name, age, email ID, password, phone number, school details, location details, designation and these will be self-declared by you while you create the account.
- â€¢ Fill the donation form on our Website and make a donation to CWC- we collect your name, billing address, email ID, phone number, PAN details bank account/card details while you make donations through Razorpay and other KYC details as mandated by the Reserve Bank of India, and/or mandatory for audit purposes, from time to time
- â€¢ Details provided by you for getting 80G exemption certificates including but not limited to Aadhar card and PAN card details.
- â€¢ Submit information to volunteer with us or apply for roles at CWC

We may also collect your Personally Identifiable Data from government databases and government-provided sources including education departments and committees, for the purpose of sending you emails/text messages for the limited purpose of informing you about CWC, our programmes, workshops and / or any other teaching-learning material as approved by the education department. In our communications, we will provide you with the option to opt out of receiving our emails and messages, and if you choose to do so, we will not contact you further.

2.2. Permissions required on the App

By downloading and using the App, you may be required to consent to provide permissions for the App to use the following:

i. Microphone- This is used by the App solely for the purposes of recording your voice when the App explicitly requests you to record your voice while consuming Content on the App. Such recordings are stored locally only on your device. Further, the App may redirect you to Google Meet, Zoom or other applications/websites to attend the training programs. Google Meet, Zoom or such apps/website may then require access to your microphone and camera and the same will be governed by those apps/websites' respective privacy policies, and CWC is not responsible for how those websites/apps use your data.

ii. Access to file manager- This is used by the Android App to transfer content to an external storage space. Additionally, on the Desktop app, this is used to transfer Content to and from an external storage device like a pen drive or SD card.

iii. Read access of SMS- This is used by the App to auto read and validate mobile numbers for registrations and to reset passwords.

iv. GPS permissions: These are required to auto-capture the location from which a form [such as workshop related form] is being submitted. We do not share this location data with any third parties.

2.3. Non-Personally Identifiable Data

This is the data that does not identify you as a specific individual on its own or in combination with other data ("**Non-Personally Identifiable Data**").

A. Non-Personally Identifiable Data collected online

When you use our Website, App or fill any online forms, or provide information at workshops that we subsequently digitize, we may collect the following data:

i. Website/App usage data: This includes:

a. The website's Uniform Resource Locator ("**URL**") that you just came from

b. Landing pages and referring pages and URLs

c. Which URL you next go to

d. Browser used

e. Device information such as hardware configuration and operating system, Android Type

f. Date and time of your usage of the Website/App

g. Search terms, domain names

h. Number of clicks, time you spend viewing each page of the Site;

i. Name of and information about any advertisement or other third party website that brought you to us

j. Features browsed,

k. Materials downloaded from the App,

l. Videos watched, etc.

m. IP address:

On the Website, your IP address is not collected, and is collected only when you make donations.

When you install the App, your IP address is collected once, for the limited purpose of ascertaining the State, City and District of origin. The State, City and District determined through this process are then saved against as part of your TEACHOPIA Device Profile. Registered Users are free to edit the State and District details at any time through their TEACHOPIA Device Profile.

n. TEACHOPIA Device Profile - In order to create a customised experience for you, as detailed in the section, an anonymised TEACHOPIA Device Profile is generated when a User or Registered User uses TEACHOPIA App from any device. The TEACHOPIA Device Profile comprises the information collected about you depending on your mode of access of TEACHOPIA.

ii. Workshop participation related data: Number of interested users, number of participants, geographical locations of the interested schools.

iii. Educational metrics [anonymised/aggregated] data: Number of students in the school, student-teacher ratio, number of students who participated in the workshops, number of students who completed the material modules downloaded from the App, subject-wise participation, assessment or test scores, class score averages

iv. Material downloads related- details of when the downloads were made, the browser, account from which downloads were made, number of downloads and other analytical data.

v. Geographic data- Locations of interested schools

vi. Telemetry data in relation to your use of the Site and App.

vii. The Website and App uses Google Analytics to collect certain non-personally identifiable data listed above including browser type, android type and device related data which helps us assess how users interact with our Website/App. Please note that Google Analytics may collect personal data and the same is governed by and subject to the privacy policy of Google, and CWC is not responsible for the same.

B. Non-personally Identifiable Data Collected offline [later digitized]:

i. Workshop Participation Data: Number of schools that participated, number of teachers and students who participated, geographical locations of the participating schools, teacher student ratio, grades/study levels of the participating students, anonymised educational metrics [as set out in A(iii) above

ii. Survey and feedback Data: Received from participating schools, teachers and students through offline forms

iii. Geographic Data: Locations of workshops, events, interested schools

2.4. <u>Third-Party Information</u>

The App uses third party services that may collect information used to identify you. These are governed by the privacy policies of the respective third party service providers, links for which are provided below:

Google Play Services (https://policies.google.com/privacy (https://policies.google.com/privacy))

Google Analytics for Firebase (https://firebase.google.com/policies/analytics (https://firebase.google.com/policies/analytics))

Firebase Crashlytics (https://firebase.google.com/support/privacy/ (https://firebase.google.com/support/privacy/))

You may interact with our content on Social Media Platforms. Additionally, our Website and App may include social media features, such as the Facebook, Instagram, Linkedin and Twitter/X buttons, Share This buttons, Youtube, Spotify, etc (collectively, "**Social Media Features/Platforms**"). These Social Media Features/Platforms may collect your IP address, what page you are visiting on

our Site and may set a cookie to enable Social Media Features/Platforms to function properly. Your interactions with these Social Media Features/Platforms are governed by the privacy policy of their respective providers.

2.5 Cookies

We may use cookies to collect information about you. Cookies are small amounts of information in the form of text files which we store on the device you use to access our Website/App and allow us to monitor your use of the Website/App and simplify your use of the same. If you do not want information to be collected through the use of cookies, your browser allows you to deny or accept the use of cookies. However, you may then not be able to take advantage of some of the features on the Website.

Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the relevant third party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

3. Use of Data collected

We will use the data from you only as permitted by law, and subject to the terms of our Privacy Policy, solely for the following purposes:

3.1. To ensure that the services we provide and/or the content on the Website and App is presented in an effective manner for your use.

3.2 To provide you with information pertaining to the Website, the App and our services, workshops and materials

3.3 To suggest relevant Content based on your activity on TEACHOPIA App, to track your progress, to validate your contact details and to issue certificate for courses and other learning experiences on TEACHOPIA App

3.4 To resolve disputes; troubleshoot problems; help promote safe and efficient usage of TEACHOPIA App

3.5 To measure interest in the services provided on TEACHOPIA

3.6 To inform you as required; detect and protect you and us against error, fraud and other criminal activity;

3.7 To contact you to conduct workshops

3.8 To permit you to download our materials from the App

3.9 To notify you about workshops, upcoming events, materials available

3.10 To notify you about any changes and improvements to the Website/App, or for analytical purposes, including but not limited to assessing usage data, usage patterns, and other similar activities.

3.11 To process transactions, receive donations, for identification and authentication purposes, to communicate with you concerning transactions, security, privacy, and administrative issues relating to your use of the Website/App, to fulfil your specific requests, or to inform you of events, workshops and materials that we think may be of interest to you.

3.12 To contact and record communication with you, to save feedback, to help solve any issues you might be facing, and to respond to you.

3.13 At times Multiple Users may be looked at to identify problems or resolve disputes, and in particular, we may examine your information or data to identify users using multiple User IDs or aliases.

3.14 To compare or review your Data for errors, omissions and to ensure accuracy

3.15 To enforce the Terms of Use or other agreements between us

3.16 We use information collected from cookies and other tracking technologies to improve your user experience.

3.17 For any other lawful purpose that we may specifically explain to you at the time you provide the information.

3.18 We use IP addresses to diagnose problems with our servers and to administer the Website and App. IP addresses are further used to help determine the number of our users to maintain efficient administration of our services. This demographic information we determine basis your IP address may also be used by us to analyse aggregate usage behaviour.

3.19 We may use Non-Personally Identifiable Data and share it with third parties to analyse request usage patterns, and other user behaviour to enable us to enhance the Website and App, and to deliver educational content, improve our workshops and materials.

3.20 We may share your Personally Identifiable Information if we are required to do so by law or we in good faith believe that such action is necessary to:

> 3.20.1 Comply with the law or with legal process (such as pursuant to court order, or instructions by governmental authority, or a request by law enforcement officials).
>
> 3.20.2 Protect, enforce, and defend our Terms, rights, and property.
>
> 3.20.3 Protect against the misuse or unauthorized use of the Site.

3.20.4 Protect the personal safety or property of our Users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

4. Sharing of your Data

4.1. Employees and officers on need-to-know basis: We value your privacy and will share your Data- Personal and Non-Personal- with our employees, officers and volunteers, who need to know the information in order for us to provide you with our services including conduct of workshops, provision of materials, and for you to be able to access the Website and App; and who are subject to strict contractual confidentiality obligations.

4.2. Legal Reasons:

We will also share Data, including Personal Data, with individuals or entities to the extent we believe, in good faith, that it is required to:

4.2.1 Ensure compliance with law/regulations and/or pursuant to enforceable orders of government, law enforcement or regulatory authorities.

4.2.2. Address fraud, security, or technical issues.

4.2.3. Protect against harm to the rights, property or safety of the Website, App its other users or the public as required or permitted by law.

4.3. For effective provision of services.

4.4. Anonymised, aggregated data may be used to conduct analytics and for research purposes.

4.5. Technical support/feedback support.

5. Retention of Data collected

5.1. We only retain and use the Data collected for the purposes mentioned above including processing your requests, queries, to respond to your feedback or correspondence, to improve our programmes, workshops and materials, and to comply with legal, regulatory or contractual obligations.

5.2. We will delete your Personal Data either upon the purpose being satisfied or you requesting us to delete your Data. However, to the extent, legally required, we will retain your Personal Data for compliance purposes beyond the satisfaction of the purpose. For example, to obtain tax benefits for donations.

5.3. 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.

5.4. 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.

5.5. We may retain the Non-Personally Identifiable Data for longer periods and will delete the same upon your request.

5.6. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

5.7. Should you apply to volunteer with or work for us, we will retain data from your application for a limited period for record keeping and legal purposes. We may (subject to laws in your jurisdiction) also retain your data in order to contact you if a role arises for which we think you would be suitable. Further information about this will be provided during the application process and we will ask for consent where necessary according to local law.

5.8. The above examples may vary in some cases due to local laws, liability periods and mandatory retention requirements. For example, if certain information needs to be retained for longer according to local laws, regulations or because different legal limitation periods apply, then we will keep the personal data for these longer periods.

6. <u>How we store and protect your Data</u>

6.1. Your information or data will primarily be stored in electronic form. However certain data may also be stored in physical form. The administrators and technology support providers of the Website and App may enter into agreements with third parties to store and process your information or data. These third parties will follow security standards to safeguard your information or data and administrators and technology support providers of the Website and App will, on a reasonable basis, require such third parties to adopt reasonable security standards to safeguard your information or data.

6.2. The security and confidentiality of your data is extremely important to us. We have implemented technical, administrative, and physical security measures to protect your information from unauthorized access and improper use. From time to time, we review our security procedures in order to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect and impenetrable, and no data transmissions over the web can be guaranteed 100% secure. Consequently, we cannot ensure or warrant the security of any Data you transmit to us, and you do so at your own risk. If you send us an email, you should know that email is not necessarily

secured against interception. Therefore, if your communication will include sensitive information like your bank account, charge card, or social security number, and you prefer not to transmit it electronically, please contact us by postal mail or telephone rather than email.

6.3. If we collect data from your computer / mobile phone, we encrypt it while it is being transferred to us. Once the data reaches our secure servers, as part of our security program, we employ standard procedures and safeguards, such as maintaining firewalls and having an intrusion detection system, to protect the confidentiality, security, and integrity of the information we maintain.

6.4. When you use the Website or App using a device, the device ID of your device is encrypted and an anonymised TEACHOPIA Device ID is created on TEACHOPIA. Your phone number and email ID are encrypted and stored securely. Additionally, a variety of methods such as network and infrastructure security, encryption and manual security procedures are used to secure your information and data against loss or damage and to help protect the accuracy and security of your personal information / general information / usage data and to prevent unauthorized access or improper use. If you think that TEACHOPIA or any your personal information / general information / usage data is not secure or that here has been unauthorized access to the website or your personal data, please contact support@TEACHOPIA-ncte.freshdesk.com immediately.

6.5. The administrators and technology support providers of the Website and App may use third parties as service providers to facilitate or outsource one or more aspects of service operations that are provided (e.g., search technology, discussion boards, technical service providers, affiliate) and therefore some of your information or data may be provided directly to these service providers. When we work with third parties, we require that they maintain the confidentiality, security and integrity of the data and commit that the data is not used for any prohibited purpose.

6.6. We use industry standard physical, technical, and administrative security measures; and commercially reasonable computer security safeguards in order to safeguard all personal data, confidential and secure. Additionally, we protect our databases and servers against risks of loss, unauthorized access, destruction, misuse, modification, or inadvertent or improper disclosure of data, which includes by internally reviewing our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

6.7. Please do not include or provide any personal information unless specifically requested in the forms or correspondence from us.

7. Children's Personal Data

7.1. The App and Website are primarily meant for the benefit and use of teachers. CWC does not knowingly collect any personal data from children under the age of 18. If you are under the age of 18, please do not submit any personal data through our Website or App or in the forms. We encourage teachers, parents and guardians to monitor their children's internet usage and to help enforce this Privacy Policy by instructing their children never to provide personal data through our Website, App or offline, without their permission or consent. If you have reason to believe that a child under the age of 18 has provided personal data to us, please contact us using the details in Clause 14 below and we will endeavour to delete that information and terminate the child's account from our databases.

7.2. During workshops, we collect only non-personal data pertaining to students. If you are a student aged below 18 years who wishes to contact us for conduct of workshops or downloading of materials, please do so through your parents, teachers or guardians. CWC may, wherever appropriate, request parents/guardians to confirm their consent.

8. Payment Processing

When you make a donation through the Website, we use your payment details only for processing purposes through Banks, Razorpay and/or other third-party payment processors ("**Payment Processors**") to assist us in processing your payment information securely.

Payment Processors adhere to security standards. Sensitive and private data exchange happens over a SSL secured communication channel and is encrypted and protected with digital signatures. The Website is also in compliance with strict vulnerability standards in order to create as secure of an environment as possible for Users.

We connect you with the Payment Processors who will collect your payment related data only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries related to such payments and refunds.

Please note that the Payment Processors may collect some Personal Information from you, which allows them to process your payments (such as your email address, postal address, credit card details, bank account number, UPI ID) and handle all the steps in the payment process through their systems, including data collection and data processing. The Payment Processors' use of your Personal Information is governed by their respective privacy policies which may or may not contain privacy protections as protective as this Policy. We suggest that you review their respective privacy policies.

9. Your representations

You represent to us that the information or data you provide on the Site and/or App from time to time is and shall be correct, current and updated and you have all the rights, permissions and consents to provide such information or data.

Your providing of the information or data and the consequent storage, collection, usage, transfer, access or processing of the same in accordance with the Terms of Use and this Privacy Policy shall not be in violation of any third-party agreement, laws, charter documents, judgments, orders and decrees.

10. Information for which we are not responsible

The Website and/or App may have Content, webpages, cookies, files, software, data or other information or communication links that are originated, created or posted by third parties that may have the capability to collect, store or use your data or information.

The administrators and technology support providers of TEACHOPIA Website/App are not responsible for such data or information collected, stored or used by third parties even if such third parties use TEACHOPIA to collect, store or use such data or information.

If you access TEACHOPIA through a third party QR code scanner or through a web browser, the administrators and technology support providers of TEACHOPIA are not responsible for the data or information collected by such third parties.

11. Your rights

As data principal, you have the following rights, under law, regarding your Personal Data:

11.1. Right to access to your personal data (commonly known as a "data subject access request"). This enables you to receive summary and copies of the personal data we hold about you and to check that we are lawfully processing it. You have to right to get identities of all entities to whom

11.2.Right to correct the personal data that we hold about you: This enables you to have any incomplete or inaccurate data we hold about you corrected, completed or updated, though we may need to verify the accuracy of the new data you provide to us.

11.3. Right to erasure of your personal data: This enables you to ask us to delete or remove personal data. Please note that deletion of certain information or data may lead to cancellation of your registration with TEACHOPIA Site/App. and your access to certain features of TEACHOPIA Site/App. Please also 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.

11.4. Right to grievance redressal: You have the right to file a complaint with our Consent Manager in accordance with clause 14 below.

11.5. Right to nominate: You have the right to nominate any individual to exercise your rights, in the event of your death or incapacity.

11.6. Right to 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.

11.7. Right to "opt out"- You have the right to opt out of receiving communications from us.

12. Identity Theft

There may be instances when you receive a seemingly legitimate looking e-mail asking for your personal information such as your ID or your credit card details.

Please note that CWC will never ask for such information from you through email.

Such activities carried on by unauthorized individuals are illegal and termed phishing or identity theft. In case of any suspicion of such activity, we advise you to not respond to such mail and to take such action as you see fit.

13. Grievances and Complaints

We have appointed a Consent Manager who is responsible for overseeing questions in relation to this privacy policy and addressing your grievances.

If you have any questions about this privacy policy, including any requests to exercise your legal rights under Clause 12 above, or redressal of rights, please contact the Consent Manager using the details set out below.

Contact details

Full name of legal entity:	Caring with Colour-A Manasi Kirloskar Initiative
Name of the Consent Manager:	Ms. Sadhna Prasad
Email Address of Consent Manager:	sadhna.prasad@caringwithcolour.org

Postal Address:	# 573, 17th Cross Rd, Binnamangala, Hoysala Nagar, Indiranagar, Bengaluru, Karnataka 560038
Telephone Number:	+91 8951178983

To process your request, we may ask you to:

- â€¢ Verify your identity (e.g., through a government-issued ID or contact details)
- â€¢ Specify the nature of the request (e.g., correction, access, deletion)
- â€¢ Provide any additional details needed to identify your data in our systems
- â€¢ Provide any other details as may be required for processing your request or addressing your grievance.

14. Changes to the Privacy Policy

This Privacy Policy is under regular review. This version was last updated on 01-Oct-2025.

Historic versions can be obtained by contacting the Consent Manager.

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.

We recommend that you check the Policy from time to time for updates.

15. Governing Law and Jurisdiction

This Privacy Policy shall be governed in all respects by the laws of Karnataka, India.

If you use the Site outside India, you are responsible for complying with the legislation wherever you are located.

The courts of Karnataka, India shall have exclusive jurisdiction over any matters arising out or in relation to these Terms.