



## **HUMANE ANIMAL SOCIETY (HAS)**

### **DATA PROTECTION POLICY**

#### **1. OBJECTIVE**

**1.1.** The Data Protection Policy of the Humane Animal Society (HAS) is established to safeguard the personal data of employees, beneficiaries, volunteers, donors, and any other individuals associated with the organization.

**1.2.** This Policy aims to ensure compliance with relevant data protection laws, maintain confidentiality, and uphold the highest standards of data security.

**1.3.** The objective is to create a framework that ensures the responsible and ethical handling of personal data.

#### **2. APPLICABILITY**

**2.1.** This policy applies to all individuals associated with the HAS, including but not limited to employees, volunteers, interns, contractors, donors, and beneficiaries.

**2.2.** It encompasses all personal data processed by HAS, regardless of its form (digital or physical) and the medium through which it is stored or transmitted.

#### **3. DEFINITIONS**

**3.1. Personal Data:** Any information relating to an identified or identifiable individual.

**3.2. Processing:** Any operation or set of operations performed on personal data, whether by automated means or not.

**3.3. Data Subject:** An individual whose personal data is being processed.

#### **4. DATA COLLECTION AND USE**

**4.1.** HAS will only collect personal data that is necessary for legitimate purposes, such as program delivery, donor management, volunteer coordination, and compliance with legal obligations.

**4.2.** Personal data will be collected directly from individuals wherever possible, and consent will be obtained for the specific purposes of data collection.

**4.3.** HAS will ensure transparency by informing individuals about the purposes for which their data is collected and how it will be used.

4.4. Personal data will only be used for the purposes for which it was collected, unless explicit consent is obtained for other uses or as permitted by law.

## **5. DATA STORAGE AND SECURITY**

5.1. Personal data will be stored securely using appropriate technical and organizational measures to prevent unauthorized access, disclosure, alteration, or destruction.

5.2. Access to personal data will be restricted to authorized personnel who require access for legitimate purposes.

5.3. Personal data will be retained only for the period necessary to fulfil the purposes for which it was collected or as required by law. Upon expiration of the retention period, data will be securely deleted or anonymized.

## **6. DATA ACCESS AND RIGHTS OF INDIVIDUALS**

6.1. Individuals have the right to access their personal data held by HAS. Requests for access should be made in writing to the Chief Operating Officer.

6.2. Individuals have the right to request corrections of inaccurate or incomplete personal data. Requests for correction should be directed to the Chief Operating Officer.

6.3. Individuals have the right to request deletion of their personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected.

6.4. Individuals have the right to object to the processing of their personal data and to withdraw consent at any time. Such requests will be honoured to the extent required by law.

## **7. DATA SHARING AND TRANSFER**

7.1. HAS will not disclose or transfer personal data to third parties without consent, except where necessary for legitimate purposes or as required by law. This includes sharing data for operational needs, compliance with legal obligations, or for the protection of vital interests.

7.2. When personal data is shared with third parties, appropriate contractual safeguards will be implemented to protect the data. This includes ensuring that third parties are contractually obligated to adhere to data protection standards equivalent to those of HAS and conducting regular audits to ensure compliance.

7.3. Transfers of personal data outside of India will be conducted in accordance with applicable data protection laws and with appropriate safeguards in place.

## **8. DATA BREACH RESPONSE**

8.1. HAS will maintain a data breach response plan to address any unauthorized access, disclosure, or loss of personal data.

8.2. In the event of a data breach, HAS will promptly investigate, assess the risk to individuals, and take appropriate measures to mitigate the impact.

8.3. Individuals and relevant authorities will be notified of data breaches as required by law.

## **9. TRAINING AND AWARENESS**

**9.1.** HAS will provide regular training and awareness programs to personnel on data protection principles, policies, and procedures.

**9.2.** Personnel will be educated on their responsibilities for protecting personal data and reporting any suspected violations or breaches.

**9.3.** Training will be updated regularly to reflect changes in data protection laws and best practices.

## **10. MONITORING AND COMPLIANCE**

**10.1.** HAS will monitor compliance with this Policy and conduct audits and assessments to ensure adherence to applicable laws and regulations.

**10.2.** Violations of this Policy may result in disciplinary action, including termination of employment or contract.

## **11. EXCEPTION**

Exceptions to this Policy may be made only when required by law or with approval from the Managing Trustee.

## **12. INTERPRETATION**

**12.1.** Matters not specifically addressed in this Policy will be handled by the Chief Operating Officer in consultation with the in-house Legal Counsel.

**12.2.** The interpretation of this Policy rests exclusively with the Humane Animal Society (HAS).

## **13. EFFECTIVE DATE**

This Policy supersedes all previous data protection policies and is effective 10-08-2024 upon approval by the Board.

For **Humane Animal Society (HAS)**



Managing Trustee

Dr. Mini Vasudevan  
Managing Trustee