

PRIVACY POLICY OF WORLD HEALTH PARTNERS

Effective date: February 1, 2021

Last updated on: April 1, 2021

1. GENERAL

- a. World Health Partners (WHP) is a registered non-profit organization in India and in the US. Its focus is on delivering health and reproductive health covering wide range of services including but not limited to primary health, family planning, maternal health, treatment for tuberculosis and childhood illnesses.
- b. For efficiently implementing its programmes and achieving higher impact, WHP will use a web/mobile application-enabled management system.

WHP is committed to protecting and respecting the privacy of all the constituents it engages with. Since WHP frequently collects personal information and processes, such data will always be handled in accordance with the Information Technology Act, 2000 (21 of 2000) and its subsequent amendments in India and corresponding laws in countries where WHP implements programmes. Besides, the programmes will ensure other national and state laws pertaining to its programmes are complied with. This Privacy Policy applies to the organisations website, www.worldhealthpartners.org; to all associated subdomains, online services, and mobile applications; and to those sites/servers/applications run and managed by WHP.

The following sections provide a comprehensive overview of WHP's data management policy and details out the practices and processes we adopt regarding personal data. This Privacy Policy covers the manner in which personal information will be collected, by whom, and for what purpose. WHP will display this Policy transparently to ensure that any person downloading, accessing, or otherwise using the Web/Mobile application is aware of this Privacy Policy and has accepted its terms.

- a. Since the Web/Mobile application will be commonly used by WHP, its employees and assigned service-providing representatives and beneficiaries (users) during whose interactions personal information is collected will be adequately informed and trained in all aspects of ethical data collection, stringent transmission and storage controls. WHP is committed to protecting the security of such information and safeguarding the privacy of individuals and groups providing such information.
- b. The complete contents of the Privacy Policy will be made available to all constituents. In cases such as providing services or dealing with illiterate segments, the Policy's salient points will be read out by the Agents/Employees of WHP in a language that is appropriate and obtain their consent by filling up a form or obtaining a voice signature or, where possible/necessary, register through video recording before personal information is collected.
- c. WHP will take all necessary steps such as limiting access or creating firewalls to ensure privacy of the data and will create in-built features in its storage to enable concealment of the identity of the targets to persons outside the official ambit.
- d. WHP reserves a unilateral right to revise the Privacy Policy from time to time. While all attempts will be made to notify the targets of all such changes and information at the last available address on record at WHP, the intimation of such changes will be provided at our website www.worldhealthpartners.org. WHP will make it obligatory for all constituents, especially communities targeted for services, to notify any change of address. The version displayed on the

website will be kept updated and will be binding on interactions among all parties. All partner firms and any third-party working with or for us, and who are authorised to access such personal information, will be expected to comply with this Policy. No third party may access or process personal information held by us without having first entered into a confidentiality agreement and obtaining our written consent.

2. HOW WE COLLECT INFORMATION

- a. **From the user directly and through applications:** We may collect information either through a direct engagement with the user or through the application. The data we collect depends on the context of the user's interactions with the app.
- b. **Through business interactions:** We may collect information during the normal business interactions and transactions with individuals, organisations and contractors we work with. We may supplement the information we collect from user with information we collect from and about user from other online and offline sources.
- c. **From other sources:** We may receive information from other sources, such as public databases, joint marketing partners, social media platforms or other third parties such as our subsidiaries and sister organisations.

3. INFORMATION WE COLLECT

We collect information primarily to provide better services to all our customers and to gather insights by which the quality of services can be improved or enhanced.

- a. When a user registers on the application, the following information may be collected and stored securely:
 - i. Patient profile data (Full name, Date of Birth and Gender)
 - ii. Relationship data
 - iii. Demographic data
 - iv. Locational data (including GPS coordinates)
 - v. Personal identification (including photo)
 - vi. Health data
 - vii. Reproductive health data
 - viii. Financial data
 - ix. Record identifier (medical record number)
 - x. IP address
 - xi. Postal/email/telephone data
- b. All collected information will be stored on a server controlled by WHP and a unique digital ID will be assigned to every user to facilitate ease in subsequent application-related transactions and interactions. Any data or information uploaded from the app to the server in the future will be linked to the unique ID.
- c. Whenever a user visits our application, some data may be automatically collected. This may pertain to information such as the type of mobile device or computer, Operating System (OS) running on the user's device, Internet Protocol (IP) address, unique user ID, access times and language. We may also collect information about the usage patterns adopted by the user. A consent obtained at the outset for collection of data covers this aspect of data too.

- d. We may collect service delivery or content use history, which we may aggregate with similar information from other customers to understand patterns and to create specific features that will enhance the utility of our application.
- e. The initial consent also authorises WHP to track the user's usage of the application including crash logs, usage frequency, location of the device including geo-coordinates.
- f. WHP may use cookies to automatically collect information that will be used for data analysis and bring about improvement in our service delivery. Cookies are used to monitor traffic and are small data files stored on a user's device that help us recognize the user when they come back to our sites, allowing us, to remember the email address and password used to log in on a specific computer. The information may also be used for security purposes, to facilitate navigation, to display information more effectively, and to personalize user experience.

4. HOW WE USE INFORMATION

- a. WHP will use the collected information primarily to provide, maintain, protect and improve our current services.

We do not share your personal data with third parties without your prior consent other than:

- i. With third parties who work on our behalf provided such parties adhere to the data protection principles set out in the Information Technology Act, 2000 (21 of 2000) and their subsequent amendments in India and corresponding legislation in other countries besides all other applicable laws. WHP's written agreement with such parties will enjoin stringent levels of privacy protection as us.
 - ii. To comply with laws or to respond to lawful requests and legal process.
 - iii. To protect the rights and property of WHP, its agents, customers, and others including to enforce the agreements, policies and terms of use
 - iv. In an emergency, including to protect the personal safety of any person and
 - v. For the purpose of forging collaborations or forming consortia with public, private and other non-profit entities involving the transfer of all or a part of our assets.
- b. The personal information collected from the user/beneficiary at the time of registration and subsequent interactions will be stored on the server and used only by WHP or its duly authorised assignees. Aggregated datasets will be used for the purpose of generating reports and other statistical visualisations to assist in the efficient management of the programmes.
 - c. We may use the information collected through this application to provide customer support and respond to user's requests, comments, and inquiries; send the user related information, including confirmations, invoices, technical notices, updates, security alerts and support and administrative messages.
 - d. We may also use and disclose your personal information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside the country of residence; (b) to comply with legal process, investigate and deter against fraudulent, unauthorized or illegal activity; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to

- pursue available remedies or limit the damages that we may sustain; (h) for the purposes of verification of identity or for prevention, detection or investigation, including of cyber incidents, prosecution and punishment of offences
- e. The information collected under the aforementioned clauses will not be used for any purpose other than those mentioned above. WHP uses and discloses information that falls into this category, unless applicable laws disallow such disclosures or sharing of information.
 - f. All personal information collected from the user/beneficiary at the time of registration will be retained for as long as the account remains in existence and if any medical or administrative interventions have been commenced. In case of the latter, the information will be retained until such time the interventions are completed. Beyond this period, the data may be used for research and analysis after ensuring stringent steps are taken to protect the privacy of the individuals.

We may use the personal information that user submits to us in order to contact you with any or all of these:

- a. email messages and newsletters about WHP's work and operations
- b. medical and health record upon request
- c. financial bills and receipts
- d. information about job application status or available job postings
- e. solicitation of donations, acknowledgment and thank you emails for donations/contributions
- f. receipts and tax documents
- g. event invitations
- h. press releases
- i. important notices and updates, such as changes to our terms and policies, security alerts and administrative messages
- j. personal responses to your specific requests
- k. confirmation of or updating of your contact information

5. DATA TRANSFER

- a. WHP gives the highest priority to safeguarding information about our users and due care is taken to ensure integrity of steps taken in this regard.
- b. After taking the necessary precautions, we may employ other companies and individuals to perform functions on our behalf. The functions include research and analysis, optimizing care, improving existing and developing new solutions, and providing customer service.
- c. The third-party service providers may be given access to personal information needed to perform their functions but will not be allowed to use it for other purposes. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by applicable data protection laws. Wherever necessary or possible, WHP will make all efforts to conceal the identity of the persons by masking such data before providing to third parties.
- d. WHP may release financial, medical and other personal information when we believe is appropriate to comply with the law, enforce or apply our conditions of use, and other agreements, protect the rights, property or safety of us, our users or others. This includes exchanging information with other companies and organizations for fraud protection.

6. DATA SECURITY

- a. WHP will take due care to protect data pertaining to all the constituents it engages with. Technical measures will be in place to prevent unauthorized or unlawful access to data and against accidental loss or destruction of, or damage to the data. The employees who are dealing with the system will be adequately trained & sensitised periodically to protect the data from any illegal or unauthorized usage or accidental loss.
- b. We will maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal customer information.
- c. We will take reasonable steps to help protect the users' personal information in an effort to prevent the loss, misuse, and unauthorized access, disclosure alteration and destruction.
- d. We will inform the user of his/her responsibility to protect user-names and passwords to help prevent anyone from accessing or abusing accounts and services. The user will also be discouraged from using or reusing the same passwords he/she uses with other accounts as his/her password for our services.
- e. We will underline the importance for the user of protection against unauthorized access to his/her password, devices and applications. The user should sign off whenever he/she has finished using especially a non-personal device.
- f. Information a user provides to us is shared on a secure server usually located within a country where the programme is implemented. We have taken appropriate physical, technical and organizational measures designed to secure the user's information against accidental loss and unauthorized access, use, alteration or disclosure. In addition, we limit access of personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access. In countries where such servers are not easily available or cost much higher than other options, locating the server outside the country will be explored in consultation with the authorities and programme managers of the country.
- g. Information collected from the user will be stored for such period as required to complete the contracted transaction or such period as mandated under the applicable laws.
- h. We endeavour to maintain the security of user/beneficiary data on all our sites and applications. One must understand that the open nature of the internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. As a result, we cannot guarantee that any information, during transmission through the Internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. We will be open to any questions or help user may have or seek pertaining to the data stored on our servers.
- i. If WHP learns of a security breach that may affect user data, we will notify you electronically so that you can take appropriate protective steps. We may communicate with you electronically regarding security, privacy, and administrative issues related to your use. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

7. LINKS TO THIRD PARTY SITE/APPS

Our application may, from time to time, contain links to and from other Apps/Websites of third parties. If a user follows a link to any of these Apps/Websites, such Apps/Websites will apply different terms to the collection and privacy of the user's personal data. We are not responsible for these other sites, and so their posted privacy policies (not this Privacy Statement) will govern the collection and use of user information on them. We encourage users to read the privacy statements of each

website visited after leaving our application/site to learn about how user information is treated by others.

8. CHILDREN

If a user is under the age of 18 or below the age of majority in the jurisdiction in which a user resides, a user may only use our application with the consent of a parent or legal guardian. WHP, in any case we will not be liable for any cause of action that arose due to non-compliance with this section.

9. YOUR INFORMATION CHOICES AND CHANGES

- a. A user can also make choices about the collection and processing of his/her data by us. A user can access his/her personal data and retain the rights to opt out of certain services provided by us. In such cases, the user's ability to control and access his/her data will be subject to applicable laws.
- b. The user may opt out of receiving promotional emails from us by following the instructions in those emails. If the user opts out, we may still send non promotional emails, such as emails about our ongoing service delivery relationship. A user may also send requests about preferences, changes and deletions to his/her information including requests to opt out of the arrangement to share personal information with third parties by sending an email to the email address provided at the bottom of this document.
- c. User may control collection of their personal information on WHP website by setting up your web browser to inform user of when cookies are being set before a cookie is stored, user is free to refuse any request to set cookies. User may erase all WHP cookies from their hard drive. User does not have to provide their information when prompted by our sites.

Please note, however, that if user chooses to reject or erase cookies, the ability to navigate our website and any other specific application may be limited. Further, in the event user chooses not to share information, WHP will be unable to respond to any user request for information, survey or contest or other details. Finally, if user would like to modify Personal Information they have previously provided or entered, please send an email to: info@whpindia.org

10. CHANGES TO THIS POLICY

WHP may, from time to time and at its discretion, amend this Privacy Policy. The "Effective Date" legend at the top of this page indicates when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on our website. Your continued use of our applications/sites following these changes means that you accept the revised Privacy Policy.

If the user has any concern about privacy or grievances with us, please contact us with a thorough description which will help us to resolve the issue.

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