# Data Protection Policy

**Global Institute for Circular Economy and Sustainable Development Goals (ICE&SDGs)**

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| **Policy owner** | Data Protection Officer / Privacy Lead, ICE&SDGs |
| **Contact** | connect@ce-sdg.org |
| **Approved by** | Governing Council / Management, ICE&SDGs |

## Contents

## 1. Purpose and Scope

This Data Protection Policy ("the Policy") sets out how the Global Institute for Circular Economy and Sustainable Development Goals ("ICE&SDGs", "the Institute", "we", "us" or "our") protects personal data and meets its obligations as a data fiduciary. ICE&SDGs is India's pioneering non-profit institution advancing environmental security and sustainable development, working with organisations, governments and citizens across India and internationally through its Academy, ESG advisory, certification, CSR, social impact audit, research and product activities.

The Policy explains, in one document, both (a) our internal governance — the principles, roles and controls every part of ICE&SDGs must follow when handling personal data — and (b) our public commitment to the individuals whose data we hold. It complements and should be read together with the ICE&SDGs / Krÿstähl Privacy Policy and Cookie Policy published on our platforms.

### 1.1 Who this Policy applies to

- All ICE&SDGs staff, leadership, interns, volunteers, certified assessors, consultants and contractors who process personal data on behalf of the Institute.
- All personal data processed by ICE&SDGs, in any format (digital or physical), across its websites, the ESG/BRSR reporting portal, Academy programmes, advisory and audit engagements, events and partnerships.
- All third-party processors that handle personal data on our behalf.

## 2. Definitions

The following terms are used throughout this Policy:

| Term | Meaning |
|---|---|
| **Personal data** | Any information relating to an identified or identifiable individual (a Data Principal / data subject), such as name, email address, phone number, postal address or payment details. |
| **Processing** | Any operation performed on personal data — collection, recording, storage, use, sharing, disclosure, retention or erasure. |
| **Data Principal / Data Subject** | The individual to whom the personal data relates. |
| **Data Fiduciary / Controller** | ICE&SDGs, which determines the purpose and means of processing personal data. |
| **Data Processor** | A third party that processes personal data on behalf of ICE&SDGs (e.g. payment gateways, IT and hosting providers). |
| **Consent** | A free, specific, informed and unambiguous indication of the Data Principal's agreement to processing for a stated purpose. |
| **Personal data breach** | Any unauthorised access to, or accidental or unlawful loss, disclosure, alteration or destruction of, personal data. |

## 3. Data Protection Principles

ICE&SDGs commits to processing all personal data in line with the following principles, which reflect the Digital Personal Data Protection Act, 2023 (India), the Information Technology Act, 2000 and its rules, and the EU/UK General Data Protection Regulation (GDPR) where applicable:

- **Lawfulness, fairness and transparency —** we process personal data only on a lawful basis (primarily consent, or another lawful ground) and are open about how we use it.

- **Purpose limitation —** data is collected for specified, explicit and legitimate purposes and is not used in ways incompatible with those purposes.
- **Data minimisation —** we collect only the data that is adequate, relevant and necessary for the stated purpose.
- **Accuracy —** we take reasonable steps to keep personal data accurate and up to date, and to correct it where needed.
- **Storage limitation —** we retain personal data only for as long as necessary for the purpose or as required by law.
- **Integrity and confidentiality (security) —** we apply appropriate technical and organisational measures to safeguard personal data.
- **Accountability —** we take responsibility for compliance and can demonstrate it through records, controls and this Policy.

## 4. Personal Data We Process

ICE&SDGs processes the following categories of personal and organisational data, primarily collected when individuals register on our portals, enrol in Academy programmes, engage our advisory, certification or audit services, subscribe to our newsletter, or contact us:

| Category of data | Examples | Primary purpose |
|---|---|---|
| Identity & contact data | First and last name, email address, phone number, postal address, city, state/province, ZIP/postal code | Registration, identification, communication, service delivery |
| Organisational data | Organisation name, role, ESG/BRSR and BRSR Lite report data and related business information | Delivery of ESG reporting, advisory, certification and audit services |
| Payment data | Payment and transaction details processed via secure third-party gateways | Processing and validating payments for services |
| Technical & usage data | IP address, browser/device data, cookies and analytics (e.g. Google Analytics) | Website operation, security, analytics and service improvement |
| Programme & learning data | Enrolment and participation records for Academy courses, training and mentoring | Administering courses, certifications and impact programmes |

We do not knowingly collect special-category or sensitive personal data beyond what is necessary to deliver our services, and we do not collect personal data from children under 18 without verifiable parental or guardian consent (see Section 11).

## 5. Lawful Basis and Purposes of Processing

We process personal data only where we have a lawful basis to do so. For most activities this is the consent of the Data Principal, given when they register, enrol, transact or otherwise engage with us. Other bases may include performance of a contract, compliance with a legal obligation, or our legitimate organisational interests where these are not overridden by the rights of the individual.

We use personal data to:

- Process registrations and deliver ESG reporting (BRSR / BRSR Lite), advisory, certification, CSR, audit, research and product services.

- Process and validate payments for our services.
- Communicate with users about course and service updates, advisory information, and responses to enquiries and complaints.
- Operate, secure, maintain and improve our websites, portals and services.
- Send newsletters and updates where the individual has subscribed, with an option to unsubscribe at any time.
- Meet legal, regulatory and reporting obligations.

We do not sell, rent or trade personal data, and we do not use it for third-party marketing.

## 6. Consent

Where processing is based on consent, ICE&SDGs ensures that consent is freely given, specific, informed and unambiguous, and obtained through a clear affirmative action (for example, registering on the portal or subscribing to communications). Individuals may withdraw consent at any time by contacting connect@ce-sdg.org or by using the “unsubscribe” link in our emails. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal, and some data may be retained where another lawful basis or legal obligation applies.

## 7. Information Sharing and Third-Party Processors

ICE&SDGs does not sell, rent or share personal information with third parties for marketing or any unrelated purpose. We share personal data only where necessary, and under appropriate safeguards, with:

- Third-party service providers (data processors) such as payment gateways, IT, hosting and analytics providers, who process data on our instructions and for operational purposes only (e.g. payment processing and validation).
- Authorities, regulators or professional advisers where required by law, regulation or legal process.

We treat your organisational data and ESG / BRSR / BRSR Lite report data as confidential. Such data is not shared with any other business, organisation or competitor. It belongs to you or your organisation and remains within the portal you access for ESG reporting purposes only.

Where we engage processors, we require them, through written terms, to implement appropriate security measures, to process data only as instructed, and to assist us in meeting our data protection obligations.

## 8. Data Security

ICE&SDGs implements reasonable technical and organisational measures designed to protect personal data against unauthorised access, use, alteration, disclosure or loss. These measures include, as appropriate to the risk:

- Access controls, authentication and role-based access on a need-to-know basis.
- Use of secure, reputable third-party gateways for payment processing.
- Network and platform security measures, including essential security cookies and verification of identity.

- Confidentiality obligations for staff, assessors, consultants and contractors.
- Periodic review of access rights, vendors and security practices.

No method of transmission or storage is entirely secure, and we cannot guarantee absolute security. We continually work to strengthen our safeguards and respond promptly to identified risks.

## 9. Data Retention

We retain personal data only for as long as necessary to fulfil the purpose for which it was collected, to provide our services, and to meet legal, accounting, audit or regulatory requirements. When data is no longer required, we securely delete, anonymise or destroy it. Organisational ESG report data is retained within the relevant reporting portal in line with the service provided to the client.

## 10. Rights of Data Principals

Subject to applicable law, individuals whose personal data we hold have the right to:

- Access the personal data we hold about them and obtain information about how it is processed.
- Request correction or updating of inaccurate or incomplete data.
- Request erasure or deletion of their personal data where there is no overriding legal basis to retain it.
- Withdraw consent and unsubscribe from communications at any time.
- Nominate another individual to exercise their rights in the event of death or incapacity, as provided under the Digital Personal Data Protection Act, 2023.
- Raise a grievance or complaint about how their data is handled.

**European / UK residents:** where the GDPR applies, individuals additionally have the rights to data portability, to restrict or object to processing, and to lodge a complaint with their local supervisory authority, in addition to the rights set out above.

To exercise any of these rights, contact us at connect@ce-sdg.org. We will verify the request and respond within the timelines required by applicable law.

## 11. Children’s Privacy

Our websites, training courses and mentoring programmes are not intended for individuals under the age of 18. We do not knowingly collect personal data from children under 18 without verifiable parental or guardian consent. If you believe a child has provided us with personal data without such consent, please contact connect@ce-sdg.org so we can take appropriate steps to remove it.

## 12. Cookies and Analytics

Our websites and platforms use cookies to enable core functionality, remember preferences, and gather analytics. Cookie categories include essential cookies (security, identity verification, service provision and network management), analytics cookies (understanding usage and improving service, without identifying individuals personally) and functional cookies (remembering choices to personalise the experience). We also use Google Analytics to understand website traffic.

Individuals can decline or delete non-essential cookies through their browser settings, though some features may then not function properly. Our separate Cookie Policy governs the use of cookies in detail and should be read together with this Policy. Please note that our sites do not currently respond to “Do Not Track” browser signals.

## 13. International Data Transfers

ICE&SDGs is based in India and works with international partners. Where personal data is transferred outside the country of residence (for example, to cloud, hosting or analytics providers), we take steps to ensure an appropriate level of protection consistent with this Policy and applicable law, including contractual safeguards with the relevant processors.

## 14. Personal Data Breach Management

ICE&SDGs maintains procedures to detect, report and respond to personal data breaches. Any actual or suspected breach must be reported immediately to the Data Protection Officer / Privacy Lead at connect@ce-sdg.org. On becoming aware of a breach, we will:

1. Contain the breach and assess the nature, scope and likely impact on affected individuals.
2. Notify the relevant data protection authority (including the Data Protection Board of India, and other regulators where applicable) where required, within the timelines set by law.
3. Notify affected Data Principals where the breach is likely to result in a risk to their rights.
4. Record the breach, the response and lessons learned, and take corrective action to prevent recurrence.

## 15. Roles and Responsibilities

Accountability for data protection is shared across the Institute:

- **Governing Council / Management —** provides oversight, approves this Policy and ensures adequate resources for compliance.
- **Data Protection Officer / Privacy Lead —** owns and maintains this Policy, handles rights requests and breaches, advises teams, and is the point of contact at connect@ce-sdg.org.
- **Staff, assessors, consultants and contractors —** follow this Policy, complete any required training, process data only for authorised purposes, and report risks and breaches promptly.
- **Third-party processors —** comply with contractual data protection obligations and assist ICE&SDGs in meeting its responsibilities.

## 16. Governing Law and Jurisdiction

This Policy is governed by and construed in accordance with the laws of India, including the Digital Personal Data Protection Act, 2023 and the Information Technology Act, 2000 and rules made thereunder. The courts at Hyderabad, India shall have exclusive jurisdiction over any dispute arising from or in connection with this Policy, without prejudice to the statutory rights of Data Principals to approach the relevant data protection authority. Where the GDPR or other local laws apply to particular individuals, those provisions are observed in respect of those individuals.

## 17. Review and Changes to this Policy

ICE&SDGs reserves the right to update or modify this Policy at any time to reflect changes in law, technology or our practices. This Policy is reviewed at least annually. The current version, together with its effective date, is published on our website, and continued use of our services constitutes acknowledgement of the latest version. We encourage individuals to review the Policy periodically.

## 18. Contact Us

For any questions, requests or complaints about this Policy or our handling of personal data, please contact:

**Data Protection Officer / Privacy Lead**
Global Institute for Circular Economy and Sustainable Development Goals (ICE&SDGs)

**Email:** connect@ce-sdg.org

**Website:** www.ce-sdg.org

*This Data Protection Policy should be read together with the ICE&SDGs Privacy Policy and Cookie Policy.*