

Population Foundation of India

SnehAI Chatbot Privacy Policy

1. INTRODUCTION

Your privacy is important to us. This Privacy Policy (“**Policy**” or “**Privacy Policy**” explains how Population Foundation of India, a non-governmental organization registered under the laws of India and having its registered office at B-28, Qutab Institutional Area, New Delhi, India (“**we**”, “**us**”, “**ours**”) collects, processes, uses, protects, and shares your personal information. Please note that this policy is only valid for the SnehAI Chatbot (“**Chatbot**”), its Facebook page (<https://www.facebook.com/snehaiapkidost>), our Website, <https://snehai.org/> (“**Website**”), and other applications (collectively “**Services**”). This policy is not applicable to any information collected by the Population Foundation of India offline or via Population Foundation’s other online channels other than this website.

We value the trust our users place in us when they give us access to their personal information and are committed to protecting and respecting your privacy. We comply with all applicable data protection and privacy laws. Our Chatbot is compliant with European Union’s General Data Protection Regulation. We look after your information as if it was our own and we require all of our partners do the same. We will never sell your information to anyone. Your information is held for only as long as is absolutely necessary.

Please read this Policy carefully as it sets out important information relating to how we collect, use, and share your personal information and your choices and rights regarding our use of your personal information in connection with (a) your access and use of our Website (<https://snehai.org/>) (b) our Chatbot; (c) our social media pages relating to the SnehAI Chatbot; and (d) our Services

We will have access to information covered by this Policy. Please note that for the purposes of our Privacy Policy and our Terms, references to “**you**”, “**your**” and “**yourself**” refer to any natural person aged 18 years or above who is competent/capable of contracting within the meaning of the Indian Contract Act, 1872. If you are a minor over the age of 13 years and under the age of 18 years, your parent or guardian must agree to our Terms and Privacy Policy on your behalf. Please ask your parent or guardian to read these Terms and Privacy Policy with you, since they constitute an agreement between your legal guardian or parent and us, and to the extent permissible under applicable laws, enforceable against you. Any persons under the age of 18 years should seek the consent of their parents/legal guardians before providing any information about themselves and before accessing or using the Applications/Websites/Services. Anyone under 13 years of age is strictly prohibited from using our SnehAI Chatbot.

This Policy, incorporates, and include our Terms of Use, and we strongly advise you to read the [Terms of Use](#) along with Policy before continuing to access our Website. If you do not agree with this Policy or Terms of Use, please do not access or use this Website or our Services.

In all cases, you agree that that no separate act is required to make the Terms or the Privacy Policy binding on you, and that your act of visiting/accessing/using any part of the Chatbot/Website/Services (with the consent of your parent/legal guardian if you are under 18 years) constitutes your full and final acceptance of this Privacy Policy and the Terms.

2. WHAT INFORMATION WE COLLECT

This privacy policy covers personal information, including any information we collect, use and share from you, as described further below:

A. Information provided by you

No identifiable information is solicited or stored on our Chatbot. As data is not related to an identifier or identifiable natural person, it will no longer be personal data or sensitive personal data or information. There is no user registration nor are you *required* to share any personal information when you begin using the Chatbot. We assign you a random anonymised/ pseudonymised unique ID and refer to this unique user ID for all subsequent information exchange and linking your information within our database and servers. Information given by you will also be subject to the privacy settings on your personal Facebook account.

Please note that we do not knowingly or usually collect information such as your name, phone number, address, *etc.* Thus, if a user tells us that her name is “Anushka”, the Chatbot is not trained to identify, process, or store that information.

However, on rare occasions such information may be identified by the Artificial Intelligence (“AI”) processor, and hence, collected by the Population Foundation. In such cases we will do our best to irreversibly redact any personally identifiable information inadvertently submitted by you as per our legitimate interest. The only personal information that may be collected is via Cookies and Log Files, and your gender, language preference, time stamp, message count from Facebook. We discourage you from communicating personally identifiable information to the Chatbot. If you choose to include personal information in your messages, it may be shared with us and our third-party service providers, although you can write to us asking us to delete this information.

Even when you give your phone number, location coordinates, address/pin code, or bank account details, the Chatbot is not trained to recognise this information, and hence, it is not usually recorded at Population Foundation of India’s backend. This is because our AI-NLP

algorithm detects and irreversibly redacts identifiers, which include all ten digit numbers, URLs, emails, dates, locations, names from our system.

When you interact with the Chatbot, Population Foundation stores the messages exchanged between the Chatbot and yourself. However, this information is not accessed on a real-time basis. The conversations cannot be connected with your Facebook profile, name, username, etc. So, for example, if “Anushka”, who lives in Delhi, tells the Chatbot that she wants to know about contraception advice, the Chatbot and Population Foundation of India will know that Person X is seeking information on contraception and that Person X is female, but the Chatbot/Population Foundation of India will be unable identify Person X as Anushka or identify that Person X lives in Delhi. Population Foundation of India will only be aware of the aggregate gender information of its users.

B. Information we may Collect from your Usage of our Services

- As you interact with our Website or the SnehAI Chatbot or any of our Services via desktop, mobile or tablet, we may automatically collect Technical Data such as internet protocol (IP) address, your log files, browser type and version, device ID and type, operating system used by the device, your internet service provider, date and time stamp, referring/exit pages, and the number of clicks, and any other information collected through cookies, web beacons, and other tracking technologies. We may also collect anonymous website analytics statistics, all of which help us analyse user interaction and traffic on our Services.

A cookie is a small data element which a website can send to your browser. This data element will be stored on your hard drive so that it can be recognised when you return. Like any other website/chatbot, we use cookies. These cookies are used to store information including visitors’ preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimise the users’ experience by customising our Website’s/Chatbot’s content based on visitors’ browser type and/or other information. Our Website will display a pop-up when you visit it for the first time; cookie tracking will only be enabled once you accept the pop-up. You may change to set your web browser settings to refuse cookies, or to alert you when cookies are being sent. If you do so, note that some parts of the Website may not function properly.

- We may also collect information about the way you use this Website, our Chatbot and Services, including browsing patterns and actions, and the time spent on each web page.
- We may also receive Technical Data about you if you visit other websites employing our cookies
- We may use third party applications/ plug-ins and they may place cookies and user-information technologies to provide better and personalised user experience.

All this information helps make SnehAI a better bot.

C. Information we Receive from Third Parties

We collect information about you from third parties we interact with such as Facebook. The Chatbot is not able to connect you to your Facebook profile, nor can it access your Facebook profile. The only information it collects from your Facebook user data is the language preference and gender, time zone, and analytical data, and with your consent, your age. Some of the information we may collect is as follows:

Information	Is it redacted?
Facebook ID	Yes
Gender	Yes
Language Preference	No
Timestamp	No
Message Count	No

While the Chatbot is embedded in Facebook, the software application is hosted on another platform, provided by our technology partner, Jio Haptik Technologies Limited. This platform provides aggregated and analysed information such as – 500 boys spoke to the Chatbot in the month of November, as opposed to 1,500 girls. It also analyses the questions asked by users, their engagement with the Chatbot, the stories and videos that are watched/listened to the most, etc. However, all such information is aggregated and de-identified and/or anonymized.

3. HOW AND WHY WE COLLECT AND USE YOUR INFORMATION

We collect, aggregate, analyse, and review (collectively referred to “**process**”) your information in accordance with fair, accountable and transparent processing principles as required under applicable law.

The information collected by us/provided by you/provided by third parties is processed only for the purposes which are reasonably expected, that is, for improving and maintaining the performance of the Chatbot, enhancing user experience, improving our Services and our Content, and to personalise the Website and Chatbot, etc.

Please note that we do not use your messages or any personal identifying information you provide to us/we collect from you to generate revenue for the Population Foundation of India. Your information, messages or use of the Chatbot is not used for direct marketing nor is it sold to advertisers.

On occasion, we ask users to fill a short feedback form to help improve our content. Users are asked questions such as “what is the best thing about the Chatbot?” or “how can we improve our services?” However, this information is not used to send promotional emails or messages.

We may also be collecting and storing your information for legal compliance and requirements and to prevent potential fraud, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and to enforce our Terms of Service.

We may also use information you provide to investigate any complaints received from you or from others, about our Website or our Chatbot or Services.

While we do not expressly process or store any Personally Identifiable Information from you, we use minimal anonymised data required to improve the functioning of the Chatbot and for other research and statistical purposes based on our legitimate interest to improve our Services. We also use anonymized and minimal conversation messages to tag, train and continually improve the performance of our rule-based AI/NLP algorithms. This processing is based on our legitimate interest to provide the best Chatbot experience and to keep improving and/or optimizing quality, safety and performance of our Services.

4. HOW DO WE SHARE THE COLLECTED INFORMATION

Please note that while none of your information is sold, it may be shared if we are required by law to do so. You never have to share anything you don't want to. This information is shared for processing of information and ensuring an optimal SnehAI chatbot experience.

A. Third-Party Service Providers

Occasionally, we enter into contracts with carefully selected third parties so that they can assist us in servicing you (for example, providing us with information technology and storage services) and improving the performance of the Chatbot. Our contracts with such third parties prohibit them from sharing/using any of your personal information for any purpose beyond the purpose for which it is shared. Each of our third-party service providers has their own terms of use and privacy policies, which they are bound by.

B. Advertisers

We may use cookies and web beacons on our Website, although we do not have any direct advertising on the website. A web beacon is an element used to track who is visiting a website. Cookies are similar — they are small elements that help a website identify you and

your preferences each time you return. Cookies and beacons help advertisers receive information about you such as your IP address, links you clicked on a website, *etc.*

Each of our advertising partners has their own Privacy Policy for their policies on user data and we have no control or access to the cookies or beacons used by them.

C. Law Enforcement Agencies

The Population Foundation of India does not collect information that will enable it to identify a user, based on their name/ other personal information/gist of the conversation. Therefore, even if a law enforcement agency makes a request to provide the entire chat history of the hypothetical user, “Anushka” with the Chatbot, Population Foundation of India would not be able to service this request and provide the information, even if it wanted to. This is because Population Foundation of India anonymises the user through a double binding process.

The only way in which we can share information in response to a valid legal request is if we are provided with the (a) the time of the specific impugned conversation that the law enforcement agency is interested in, and (b) the *exact* text of the chat – only as long as the information requested for has not been deleted and erased from our partner, Jio Haptik Technology Ltd’s servers, either on account of a user request or because the purpose for which the information was collected has been served. If the information is deleted – based on a user’s request or based on SnehAI’s privacy policy – the Population Foundation of India will not be able to retrieve the personal data, even if the identity of the user is provided to them

We may share whatever information is in our possession or control if we believe that disclosure is reasonably necessary to (1) enforce our agreements, policies, and terms and conditions; (2) comply with the law, including the mandatory reporting obligations regarding information or knowledge about a case of child sexual harassment/assault/pornography under the Protection of Children from Sexual Offences Act, 2012; (3) to protect the security, integrity of Population Foundation of India’s products and Services, our users, or the public from harm or illegal activities; and (4) to respond to an emergency which we believe in good faith requires us to disclose information which is in our possession.

D. Reorganisation

The Population Foundation of India may share personal information in its control or possession to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

5. WHAT ARE OUR POLICIES FOR STORAGE AND RETENTION OF INFORMATION

Where do you store this information?

We will only retain your personal information – with appropriate redactions wherever possible – for as long as necessary to fulfill the purpose we collected it for or specified herein, including for the purpose of satisfying any accounting, legal or reporting requirement. We do not retain your personal information for longer than required for the purpose for which the information may be lawfully used. Where not specified we retain your information for a maximum period of seven years since receipt and as per our Information Retention policies.

You have the Right to be Forgotten. You can also, at any point of time, clear all your provided data and chat history with the Chatbot by requesting the Chatbot to delete such data. If reasonably necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also keep hold of your some of your information as required, even after you have cleared your conversation with the Chatbot.

6. HOW DO WE PROTECT YOUR INFORMATION?

We use appropriate technical, administrative, organizational, and physical information security safeguards to help protect against loss; or accidental or unlawful destruction and loss; unauthorized access/use/modification/disclosure of information, particularly where the processing involves the transmission of data over a network, and against other unlawful forms of processing. The ways we do this include:

- All the information is stored using double binding anonymisation
- All of your messages are encrypted during transmission and storage, and your information is stored on systems which are also encrypted.
- Using encryption when collecting or transferring sensitive information
- Ensuring that our business partners have appropriate technical and organizational security measures to keep your personal information protected.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “*Contacting Us*” section below. 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.

7. USER RIGHTS

- Right to Access and Clear your Chat: The Chatbot allows you to access or clear your chat with the Chatbot. At all points of time, you can access the past chat history with the Chatbot through Facebook Messenger. If you ask, “*can I access or delete my data?*”, the Chatbot will respond saying “*kya karna chahenge aap aapke chat ke saath?*” You can then choose to “*access*” your data by sending an email to our Grievance and Data Protection Officer, or you can press “*clear chat*” in which case the chat will get cleared from your screen and it will no longer be visible to you. Your chats will only get deleted from our backend servers after you send an email request for data deletion. Therefore, you could send an email to our Grievance and Data Protection Officer, Rizwan Shaikh (rizwan.shaikh@populationfoundation.in) requesting him to provide access to/clear/delete your chat history.
- Right to Correction: You have the right to correct, delete or restrict (stop any active) processing of your personal information.
- Right to be Forgotten. You can also, at any point of time, clear all your provided data and chat history with the Chatbot by requesting the Chatbot to delete such information. IF YOU EXERCISE YOUR RIGHT TO BE FORGOTTEN AND RESET YOUR DATA, YOU WILL LOSE THE RIGHT TO ACCESS YOUR INFORMATION OR THE CHATBOT CONVERSATIONS AS THEY WILL BE PERMANENTLY DELETED.
- Right to Complain to a Supervisory Authority: If you have any questions, complaints, or grievances about the Chatbot you can contact us at snehai@populationfoundation.in or rizwan.shaikh@populationfoundation.in.
- Right to withdraw consent: To the extent that the legal basis of our processing of your Personal Information is consent, you can withdraw that Consent.

8. CHILDREN’S INFORMATION

Since the Chatbot is embedded in Facebook, you must be above the age of 13 to use it. The Population Foundation of India does not knowingly collect or solicit any information from anyone under the age of 13.

If you think your child/ward, who is under the age of 13, has provided this kind of information to our Chatbot we strongly encourage you to contact us at snehai@populationfoundation.in. and we will do our best to promptly remove such information from our records. A similar policy will be followed for information provided or ascertained from the chats of a minor over the age of 13 years and under the age of 18 years, without their parent or guardian’s consent.

9. GRIEVANCE AND DATA PROTECTION OFFICER

Recognising the significance of data protection, the Population Foundation of India has appointed a data protection officer/ a grievance redress officer who is well versed with the

intricacies of the organization's internal data privacy policies and practices. You can contact the officer for any query regarding the same, including any concerns about how we process your information, or to update your information. Following are the contact details of the officer:

Rizwan Shaikh

Data Protection Officer,

Population Foundation of India,

Email: rizwan.shaikh@populationfoundation.in

10. UPDATING THIS PRIVACY POLICY

Population Foundation of India reserves the right to change, modify, or update this Privacy Policy at any time. In case of any change, both material and non-material, it will be marked on top of the 'Privacy Policy' page and a notice on the home page of the Website, as well as on the Chatbot.

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