

U2ADOPTION.COM's Privacy Policy

INTRODUCTION

Welcome to the privacy policy of U2ADOPTION.COM (“my site”).

U2ADOPTION.COM is a website operated by me, Angana Maheshwari.

I respect your privacy and am committed to protecting your personal data. This privacy policy will inform you as to how I look after your personal data when you visit my website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND MY DETAILS

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how I collect and process your personal data through your use of U2ADOPTION.COM, including any data that you may provide to me through this website.

This website is not intended for children and I do not knowingly collect data relating to children.

CONTROLLER

I, Angana Maheshwari, am the data controller who is responsible for your personal data that I collect and process through your use of U2ADOPTION.COM. If you have any questions about this privacy policy or U2ADOPTION.COM data protection practices, including any requests to exercise your legal rights, please contact me via email at ANGANA@U2ADOPTION.COM.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection issues (www.ico.org.uk). I would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact me in the first instance.

CHANGES TO THIS PRIVACY POLICY AND YOUR DUTY TO INFORM ME OF CHANGES

I keep U2ADOPTION.COM's privacy policy under regular review. This version was last updated on 27/11/2018. Historic versions can be obtained by contacting me.

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me and U2ADOPTION.COM.

THIRD-PARTY LINKS

U2ADOPTION.COM may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and am not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy policy of every website you visit.

2. THE DATA I COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

I may collect, use, store and transfer different kinds of personal data about you which I have grouped together as follows:

Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth, gender and photographic images.

Contact Data includes your postal address, email address and telephone number.

Technical Data includes internet protocol (IP) address, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices that you use to access this website.

Profile Data includes your interests, preferences and feedback.

Usage Data includes information about how you use this website and its services.

Marketing and Communications Data includes your preferences in receiving marketing from me and UDAAN.CO.UK's third parties and your communication preferences.

I also may collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but it is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, I may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if I combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, I treat the combined data as personal data which will be used in accordance with this privacy policy.

I may receive directly from you personal data which is considered **Special Categories of Personal Data**. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. I will only process Special Categories of Personal Data relating to you when you have given me your explicit, unambiguous consent to process such data for specified purposes.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where I need to collect personal data by law, or under the terms of a contract that I may have with you, and you fail to provide that data when requested, I may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, I may have to cancel a service you have with U2ADOPTION.COM but I will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

I use different methods to collect data from and about you including through:

Direct interactions. You may give me your Identity Data, Contact Data or Special Categories of Personal Data by filling in forms or by corresponding with me by post, phone, email or otherwise. This includes: personal data you provide when you inquire about U2ADOPTION.COM services, create an account on my site, subscribe to U2ADOPTION.COM services or publications, request marketing to be sent to you or, give me feedback or contact me.

Automated technologies or interactions. As you interact with my website, it will automatically collect Technical Data about your equipment, browsing actions and patterns. I collect this personal data by using cookies, server logs or other similar technologies. I may also receive Technical Data about you if you visit other websites employing my website's cookies. Please see further details below under the heading entitled **Cookies**.

Third parties or publicly available sources. I may receive personal data about you from various third parties and public sources including Technical Data from analytics providers and search information providers such as Google or Identity and Contact Data from publicly available sources.

4. HOW I USE YOUR PERSONAL DATA

I will only use your personal data when the law allows me to, where:

- I need to comply with a legal obligation to which I am subject;
- I am relying on your explicit, unambiguous consent including (i) to interact with you when you submit information containing Special Categories of Personal Data through the “Share Your Story” or “Get Help” sections of my website, (ii) to publish your personal story on my website when it contains Special Categories of Personal Data, or (iii) before sending third party direct marketing communications to you via email or text message. Note that you have the right to withdraw your consent at any time by contacting me; or
- it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Legitimate interest means my interest in conducting and managing my website to enable me to give you the best service and the best and most secure experience. I make sure I consider and balance any potential impact on you (both positive and negative) and your rights before I process your personal data for my legitimate interests. I do not use your personal data for activities where my interests are overridden by the impact on you (unless I have your consent or are otherwise required or permitted to by law. You can obtain further information about how I assess my legitimate interests against any potential impact on you in respect of specific activities by contacting me.

PURPOSES FOR WHICH I WILL USE YOUR PERSONAL DATA

I have set out below, in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate.

Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I am using your data. Please contact me if you need details about the specific legal ground I am relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user	(a) Identity (b) Contact	Necessary for my legitimate interests (to offer you my website’s services and to develop my website’s user base)
To interact with you when you submit information containing Special Categories of Personal Data through the “Share Your Story” or “Get Help” sections of my website	(a) Identity (b) Profile (c) Special Categories of Personal Data	Your explicit, unambiguous consent
To publish your personal story on my site when it contains Special Categories of Personal Data	(a) Identity (b) Profile (c) Special Categories of Personal Data	Your explicit, unambiguous consent

<p>To manage U2ADOPTION.COM's relationship with you which will include:</p> <p>(a) Notifying you about changes to U2ADOPTION.COM's terms and conditions of use or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary for my legitimate interests (to keep my records updated and to study how users use my website and its services)</p>
<p>To enable you to complete a survey or review</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Necessary for my legitimate interests (to study how users use my site and its services, to develop my website and its services, to keep the content of my site relevant to its users, to grow my site's user base)</p>
<p>To administer and protect this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for my legitimate interests (for running my website, provision of administration and IT services, network security)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising my website serves to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for my legitimate interests (to study how users use my website and its services, to develop my website and grow its user base, to inform UDAAN.CO.UK's marketing strategy)</p>

To use data analytics to improve my website and its services, marketing, user relationships and experiences	(a) Technical (b) Usage	Necessary for my legitimate interests (to define types of users for my website and its services, to keep my website updated and relevant, to develop my website and to inform my marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for my legitimate interests (to develop my website and its services)

MARKETING

I strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM U2ADOPTION.COM

I may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what I think you may want or need, or what may be of interest to you. This is how I decide which services and offers may be relevant for you.

You may receive marketing communications from me if you have requested information from me and you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

I will get your explicit opt-in consent before I share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask me or third parties to stop sending you marketing messages at any time by contacting me or by following any opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to me as a result of your other interactions with my website and its services.

CHANGE OF PURPOSE

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact me.

If I need to use your personal data for an unrelated purpose, I will notify you and I will explain the legal basis which allows me to do so.

Please note that I may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

I may share your personal data with third parties such as service providers acting as data processors who provide IT and system administration services for the purposes set out in the table above under the heading entitled ***Purposes For Which I Will Use Your Personal Data***.

I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I do not allow U2ADOPTION.COM's third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with my instructions.

6. INTERNATIONAL TRANSFERS

If I transfer your personal data out of the EEA (such as to an external third party IT or system administration service provider), I will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

I will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

If I use certain service providers, I may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

If I use certain service providers based in the US, I may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact me if you want further information on the specific mechanism used by me for transferring your personal data out of the EEA.

7. DATA SECURITY

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to your personal data is limited to myself and other third parties such as IT and system administration service providers that may require access to your personal data for the ongoing operation of my website. They will only process your personal data on my instructions and they will be subject to a duty of confidentiality.

I 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 I am legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

I will only retain your personal data for as long as is reasonably necessary to fulfil the purposes for which I collected it, including for the purposes of satisfying any legal or regulatory requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe that there is a prospect of

litigation in respect to my and U2ADOPTION.COM's relationship with you.

To determine the appropriate retention period for personal data, I 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 I process your personal data and whether I can achieve those purposes through other means, and the applicable legal, regulatory or other requirements.

In some circumstances you can ask me to delete your data: see further details under the heading below entitled ***Your Legal Rights***.

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

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data that I hold about you and to check that I am lawfully processing it.
- **Request correction** of the personal data that I hold about you. This enables you to have any incomplete or inaccurate data that I hold about you corrected, although I may need to verify the accuracy of the new data you provide to me.
- **Request erasure** of your personal data. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where I may have processed your information unlawfully or where I am required to erase your personal data to comply with local law. Note, however, that I may not always be able to comply with your erasure request for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where I am relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where I am processing your personal data for direct marketing purposes. In some cases, I may demonstrate that I have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask me to suspend the processing of your personal data in the following scenarios:
 - If you want me to establish the data's accuracy.
 - Where my use of the data is unlawful but you do not want me to erase it.
 - Where you need me to hold the data even if I no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to my use of your data but I need to verify whether I have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. I will provide to you, or to a third party that you have chosen, your personal data in a structured, commonly used, machine-readable

format. Note that this right only applies to automated information which you initially provided consent for me to use or where I used the information to perform a contract with you.

- **Withdraw consent at any time** where I am 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, I may not be able to provide certain services to you on my website. I will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact me.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I could refuse to comply with your request in these circumstances.

WHAT I MAY NEED FROM YOU

I may need to request specific information from you to help me to confirm your identity and to ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I may also contact you to ask you for further information in relation to your request to speed up my response.

TIME LIMIT TO RESPOND

I will try to respond to all legitimate requests within one month. Occasionally it could take me longer than a month if your request is particularly complex or if you have made a number of requests. In this case, I will notify you and keep you updated.