



# भारतीय प्रबंध संस्थान अमृतसर Indian Institute of Management Amritsar

## PROTECTION OF DATA AND PRIVACY POLICY

### A. PURPOSE

This privacy policy aims to give you information on how Indian Institute of Amritsar (IIMAm) collects and processes your personal data. It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them. As the Data Fiduciary, IIMAm requires:

- To process your data in a lawful, fair and transparent way;
- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

### B. DEFINITIONS

#### Data Principal:

The individual to whom the personal data relates. This policy is addressed to the Data Principal (referred to as “you” or “your”).

#### Data Fiduciary:

IIM Amritsar is the Data Fiduciary for your personal data (referred to as IIMAm, “we”, “us” or “our” in this privacy policy). IIMAm determines the purpose and means of processing of your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Protection Manager (DPM) using the details set out below.

#### Contact Details:

Full name of legal entity: Indian Institute of Management Amritsar

Name of DPM: Dilbag Singh

Email address: am.it@iimamritsar.ac.in

Postal address: Indian Institute of Management Amritsar, Punjab Institute of Technology Building, Inside Government Polytechnic Campus, Polytechnic Road, PO: Chheharta, G.T. Road Amritsar – 143105

### C. THE DATA WE COLLECT ABOUT YOU

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

1. **Identity Data** includes first name, last name, date of birth, gender, residential address, email address
2. **Contact Data** including billing address, delivery address, email address and telephone numbers.
3. **Financial Data** including bank account details.
4. **Professional Data** includes academic qualifications and achievements, references, profession, job title, employer and professional history of the same.
5. **Sponsor Data**: Information on financial sponsor for the programme.
6. **Technical Data** including browser type, time zone setting and location and other technology on the devices you use to access our website.
7. **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
8. **Profile Data** includes your username and password to any IIMAm online service, your interests, preferences, feedback and survey responses.
9. **Usage Data** includes information about how you use our website and services.

We may, in exceptional circumstances, require the explicit consent of the Data Principal. Should such a need arise we will contact you. In such cases we will apply enhanced security measures to ensure that the privacy of the data is maintained and will only process it in accordance with the purposes as set out in [Section D].

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform IIMAm of any changes in your data at the following email address: [am.it@iimamritsar.ac.in](mailto:am.it@iimamritsar.ac.in)

### D. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to enrol you onto the programme of IIMAm;
- Where we need to support learning of the students;
  - To monitor and report on the progress of the students;
  - To assess the quality of our services;
- Where we need to provide or in preparation for providing our services to you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation;
  - To identify potential corporate clients who may be interested in our services;
  - To identify potential domain experts as guest lecturers, etc.;

- To invite students for post training, networking or alumni engagement activities;
- To determine potential for new learning programmes;

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

Generally, we do not rely on consent as a legal basis for processing your personal data other than when we need to process special category data or in relation to sending certain marketing communications to you via email in cases where we are not relying on the basis of legitimate interest. You have the right to withdraw consent to marketing at any time by unsubscribing from our emails (via the unsubscribe link within the email footer) or contacting our DPM via [am.it@iimamritsar.ac.in](mailto:am.it@iimamritsar.ac.in)

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

### Students:

If you are a student of IIMAm, this table is relevant to you:

| Purpose/Activity   | Type of Data  | Basis for Processing   |
|--|---|--|
| To enrol you as a student  | Identity, Contact, Professional, Financial, Sponsor     | Performance of the contract with students  |
| To deliver teaching services to you  | Identity, Contact, Professional, Financial              | Performance of the contract with students  |
| To (a) Manage payments, fees and charges (b) Collect and recover money owed to us                        | Identity, Contact, Professional, Financial              | Performance of the contract, Our legitimate interest to recover dues   |
| To use data analytics to improve our website, services, marketing, student relationships and experiences | Technical, Usage, Profile, Marketing and Communications | Our legitimate interests to keep our website updates, to develop our facilities and to inform our marketing strategy |

### Alumni

If you are an alumnus of IIMAm, this section is relevant to you:

| Purpose/Activity              | Type of Data      | Basis for Processing  |
|-------------------------------|-------------------|---|
| To register you as an alumnus | Identity, Contact | Our legitimate interest to deliver information to you about our alumni services |

|  |                            |   |
|--|----------------------------|---|
| To manage our relationship with you which will include notifying you about changes to our terms or privacy policy. | Identity, Contact, Profile | Our legitimate interests to keep our records updated and to observe how our alumni use our services and to comply with legal obligations. |
|--|----------------------------|---|

## Glossary for this Section

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

**Performance of Contract** means processing your data where it is necessary for the performance of a contract or agreement to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## E. DISCLOSURES OF YOUR PERSONAL DATA

We do not sell your personal data to third parties. We will only share your personal data with third parties where we are allowed or required to do so by law. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third parties 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 our instructions. Third parties who process your data on our behalf are subject to contracts under which their processing activities are managed. Where your personal data is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

## F. DATA SECURITY

We have 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, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

## H. YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure 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 we are 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 we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we 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 us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party 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 us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are 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, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

**Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing. Object to automated decision-making about you which produces legal effects or otherwise has serious impactful consequences for you.

## **I. CHANGES TO THIS NOTICE**

We may change this policy from time to time and without notice. If we make significant changes in the way we treat your personal data, or to the policy, we will endeavour to provide you notice through the website or by some other means, such as email. Your continued use of the website after such notice

constitutes your acceptance of the changes. We encourage you to periodically review this notice for the latest information on our privacy practices. We provide links to it through:

#### DISCLAIMER

IIMAm does not guarantee the accuracy of the content contained in its website. The users of this site are fully responsible for their actions when using the content of this website. IIMAm will not be liable for damages of any kind for any consequences arising out of or in connection with the use, or the inability to use, or the performance of the information, services, contents or materials contained in this website. No person working with IIMAm or on this website will be liable for any damages arising out of the use of the content contained in this website.

IIMAm reserves the right to periodically update, add to, delete or revise the content in this website, without any prior notice. IIMAm also reserves the right to make changes to the technical aspects of this website without any prior notice. The technical aspects include, but are not limited to, the front-end look and feel, the architecture, the site map, the tools and functionalities, the applications and features, and the platform.