PRIVACY POLICY

TSF Club – Improving Communication Skills of Students & Professionals

An initiative of Think Sustainability Foundation (TSF)

Introduction

TSF Club ("TSF Club", "we", "us" or "our"), an initiative of Think Sustainability Foundation (TSF), understands that privacy is tremendously important to online visitors of our website (www.tsfclub.org), to schools and institutions who use our services, and to students and professionals whose personal information we may collect to provide the services agreed to. This privacy notice describes how your personal data is collected, handled, and stored to meet TSF Club's protection standards and to comply with applicable Indian data protection laws, including the Digital Personal Data Protection Act, 2023 (DPDP Act) and the Information Technology Act, 2000 (as amended), together with rules framed thereunder.

1. Purpose of This Privacy Notice

This privacy notice describes how TSF Club collects and processes personal data through your use of the website, application and the services within it (including forums, workshops, learning resources and community features), including any data you may provide.

It is important that you read this privacy notice, together with any other privacy notice or fair-processing notice provided to you when your personal data is collected or processed, so that you are fully aware of how your data is used. This privacy notice is supplemental to any other notice and is not intended to override those. This Privacy Policy should be read together with our Terms of Use available on www.tsfclub.org.

Controller

Where services are provided to students through a school, college or educational institution ("Institution"), the Institution is generally the controller of the personal data provided via the application or platform for the purposes of those services. If you request information on data provided in that context, please contact your Institution in the first instance.

For data collected directly by TSF Club (for example, from individual professionals, open registrants, or website visitors), TSF Club / Think Sustainability Foundation is the data fiduciary (controller). Our data-privacy contact will respond to questions regarding this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details below.

Contact Information

Legal Entity: Think Sustainability Foundation (TSF) / TSF Club
Email: info@tsfclub.org
Website: www.tsfclub.org
Postal Address:
C/o Think Sustainability Foundation
Reg. Office: Door No. MP.VI 387H
Amba Prasad Building
Opp: Itoozhi Ayurveda
PO: Mayyil, Kannur District
Kerala – 670 602, India

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Changes to the Privacy Notice and Request for Current Data

This privacy notice was last updated September 2026. We may update this Privacy Policy from time to time. Please review this page periodically on www.tsfclub.org.

It is important that the personal data we hold about you is accurate and current. Please notify us (or, where applicable, your Institution) of any changes to your personal information during the use of our services.

Third-Party Links

This website 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of any website you visit.

2. Data Collection

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

We may collect, use, store, and transfer personal data, including:

- **Identity Data:** first name, last name, username, student or membership ID.
- **Contact Data:** email address, phone number (if provided), institutional affiliation.
- **Technical Data:** Internet protocol (IP) address, login data, browser type and version, time zone and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website and our services.
- **Profile Data:** username and password, preferences, feedback, and survey responses.
- **Usage Data:** information on how you use our website, forums, workshops and services.

Providing us your Personal Data

We collect personal data you provide us as required by law or under the terms of a contract with you, or your Institution on your behalf. This information is necessary for the performance of the contract or for the provision of our communication-skills programmes. You will be notified if cancellation of the contracted service is necessary in such a situation.

3. Personal Data and Non-Personal Data Collection

Non-Personal Aggregated Data

We may collect statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data by law as this data does not reveal your identity, either directly or indirectly.

Student Data

We intentionally limit the collection of personal information from children and users of our application to what is necessary to provide the service. We do not sell personal information. Through the course of providing service to an Institution, we may have access to personally identifiable information about students (“Student Data”) that is provided by the Institution, by the parent or guardian, or by the Student. We receive Student Data from the learning application(s) or platforms provided by us that are used by the Institution. We have access to Student Data only as requested by the Institution and only for the purposes of performing services on the Institution’s behalf. The Student Data we typically collect includes first/last name, email and IP address.

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Data is collected through various methods, including:

Direct interaction

Personal identity and contact data entered to complete a form, or in correspondence via email, or otherwise. Included is personal data provided when you:

- Create an account
- Subscribe to our service or programme
- Provide feedback
- Request information or support

Automated technologies or interactions

Technical data about your equipment, browsing actions, and patterns. Personal data is also collected using cookies and server logs. Collected information is used to help diagnose problems with our server and administer our website.

We may share information in an aggregated and/or anonymous form that does not reasonably identify an individual or Institution. For example, we may use and share aggregate or anonymised data to study and improve our service, user functionality and product offerings.

4. Children's Privacy

TSF Club does not knowingly collect any information from children under the age of 13 (or the applicable age of consent in local jurisdictions) unless and until the Institution (or parent/guardian) has authorised us to collect such information through the provision of the Service to Students on the Institution's behalf.

Because we collect and use Student Data at the direction of and under the control of the Institution where applicable, we rely on each Institution to provide appropriate notice to parents of the Institution's use of third-party service providers such as TSF Club and for the Institutions to provide consent and authorisation for us to collect personal information from children under the age of 13, consistent with applicable Indian law (including the DPDP Act and any rules relating to children's data) and, where relevant, other applicable data protection laws. All personal information collected from or about a child under the age of 13 is treated as "Student Data". When we collect personal information from a child on behalf of an Institution, the information is processed only as instructed by the Institution and for the limited purposes of delivering the service.

5. How We Use Your Personal Data

Use of your personal data is limited by law. To allow us to fulfil the contract entered into with you or your Institution, and for legitimate operational purposes, personal data is most commonly used for the following:

Purpose / Activity	Type of Data	Lawful Basis
Register as a new user / member	Identity; Contact	Performance of a contract with you or your Institution; consent where required
Manage our relationship with you (notify changes to terms/privacy policy; request feedback)	Identity; Contact; Profile	Performance of a contract; compliance with legal obligation; legitimate interests (maintain records and evaluate services)
Administer and protect the business and website (troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting)	Identity; Contact; Technical	Legitimate interests (run the organisation; IT and network security; fraud prevention); legal compliance
Use data analytics to improve website, services, programmes and user experience	Technical; Usage	Legitimate interests (improve relevance of services; development and strategy)

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Your personal data may be processed for more than one lawful ground, depending on the specific purpose for its use. Please contact us at info@tsfclub.org if you require additional information.

6. Cookies

Your preferred browser can be set to refuse all or some browser cookies, or to alert you when websites set or access cookies. If cookies are disabled or refused, some parts of the website may be inaccessible or fail to function properly.

Our website uses first- and third-party cookies to obtain anonymous usage statistics with the purpose of providing you with a better service. We do not track outside our website nor do we install non-essential cookies without your prior consent where required by law. Essential cookies used on our website facilitate usability and configuration and do not track Personally Identifiable Information (PII) beyond what is necessary for the service.

Third-party cookies that may be used on our website (subject to consent where required) can include analytics and security providers. Examples of cookie categories we may use:

Cookie / Type	Description	Duration
Analytics cookies (e.g. _ga*)	Used to distinguish user sessions and understand usage of the website (e.g. Google Analytics or similar).	As set by the provider
Session / essential cookies	Used to maintain your login session and essential site functionality.	Session or up to 30 days
Security cookies	Used to help identify clients and apply security settings (e.g. Cloudflare or similar).	As set by the provider

Local Storage: Additionally, some data may be stored in browser local storage, similar to cookie data, to support site functionality.

For further details or to manage preferences, please contact us at info@tsfclub.org.

Accessibility

TSF Club is committed to making our offerings accessible to all, including people with disabilities. We are continually improving the user experience for everyone by applying relevant accessibility standards and working towards conformance with the Web Content Accessibility Guidelines (WCAG 2.1 AA).

We welcome your feedback on accessibility. For further assistance, please contact us at info@tsfclub.org. We aim to respond to feedback in a timely manner.

Change of Purpose

Personal data is collected and used for a specific purpose, unless we determine its use for another reason as being compatible. Please contact us at info@tsfclub.org to receive an explanation of how processing for another purpose meets that criterion.

If your personal data must be used for an unrelated purpose, we will notify you or the Institution and explain the legal basis that allows its use.

We may process your personal data without your knowledge or consent, in compliance with the rules stated above, where required or permitted by law.

7. Disclosure of Personal Data

We may share personal data with the parties listed below for the purposes identified in this notice:

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- Internal team members and authorised personnel of Think Sustainability Foundation / TSF Club who need access to perform their roles.
- Service providers (e.g. hosting, analytics, email delivery) who process data on our instructions and under contractual obligations of confidentiality and security.
- Authorities or other parties when required by applicable law, court order, or to protect our rights, safety, or the rights of others.

We require all third parties to respect the security of your personal data and treat it in accordance with the law. Third-party service providers are not allowed to use your personal data for their own purposes. Use of personal data is permitted only for specified purposes and must be in accordance with our instructions.

We do not sell your personal information.

8. Data Security

Appropriate security measures are in place to prevent personal data from accidental loss, misuse, alteration, or unauthorised disclosure. Access to personal data is limited to those employees, agents, contractors, and third parties who are authorised to process the data on our behalf, under specific instruction and subject to a duty of confidentiality.

Procedures are in place to deal with any suspected personal data breach. You, and if legally required, any applicable regulator, will be notified of a breach within the timelines prescribed under applicable Indian law (including the DPDP Act and related rules).

9. Data Retention

Your personal data will be retained only as long as necessary to fulfil the purpose(s) for which it was collected, including legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements under Indian law.

In some circumstances, you may ask us to delete your data. Email your request to info@tsfclub.org. We will respond in accordance with applicable law.

We may anonymise personal data (to remove any association with personal identity) for research or statistical purposes, in which case the information may be used for an indefinite period without further notice to you.

10. Your Legal Rights

Under the Digital Personal Data Protection Act, 2023 and other applicable Indian laws, you (as a Data Principal) have certain rights relating to your personal data, which may include (subject to conditions and exceptions):

- Right to access information about the personal data we process about you
- Right to correction and erasure of personal data
- Right to data portability (where applicable)
- Right to withdraw consent (where processing is based on consent)
- Right to grievance redressal

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If you choose to exercise any of these rights, please contact us at info@tsfclub.org. These rights are subject to certain exceptions and exclusions under applicable law, and we may be unable to comply in full with your request; in such cases we will provide an explanation.

If you have given us your consent, you can revoke it at any time with future effect.

Your right to object / grievance

You have the right to raise a grievance regarding the processing of your personal data. If you file an objection or grievance, we will examine it and respond in accordance with applicable law. Where processing is based on legitimate interests, we will no longer process your personal data for that purpose unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing serves to establish, exercise or defend legal claims.

Fees

You are not required to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances, as permitted by law.

Request for Specific Information

We may request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This security measure ensures that personal data is not disclosed to an unauthorised person. We may also contact you to ask for additional information to speed up our response.

Response Time

We try to respond to all legitimate requests within the timelines prescribed under applicable Indian law (or, where not specified, within a reasonable period, typically one month). Occasionally, it may take us longer if your request is particularly complex. In this case, we will notify you and keep you informed.

11. Glossary

Legitimate Interest means the interest of our organisation in conducting and managing our activities 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 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 by law. You can obtain further information by contacting us at info@tsfclub.org.

Performance of Contract means processing your data where necessary for the performance of a contract 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 necessary for compliance with a legal or regulatory obligation under Indian law (including the DPDP Act, IT Act and related rules).

Data Fiduciary / Controller means the entity that determines the purposes and means of processing personal data. Under the DPDP Act, TSF Club / Think Sustainability Foundation acts as a Data Fiduciary for data it collects directly; where services are provided through an Institution, the Institution is typically the primary controller of student data.

— End of Privacy Policy —

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