

# Privacy Policy

## PoCRA DBT App

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|----------------|---------------------------------------------------------------------------|
| Scope          | Individual/Farmer DBT, Natural Resource Management (NRM), and FPO Modules |
| Issued by      | Department of Agriculture, Government of Maharashtra                      |
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## 1. Introduction

### About the PoCRA DBT App

The PoCRA DBT App is the official digital application of the Project on Climate Resilient Agriculture (PoCRA), Department of Agriculture, Government of Maharashtra.

It supports the implementation and administration of project activities through the Individual/Farmer DBT, Natural Resource Management (NRM), and Farmer Producer Organization (FPO) modules.

Depending on the module and user role, the application supports:

- Beneficiary, farmer, FPO/FPC/SHG, and authorized-user services;
- Application and proposal submission and processing;
- Verification of beneficiaries, organizations, activities, and supporting documents;
- Field inspections, verification, and monitoring;
- Geo-tagging and documentation of project activities;
- Processing of NRM activities, estimates, technical sanctions, implementation, and monitoring;
- Processing, appraisal, inspection, approval, and monitoring of FPO-related proposals;
- Documentation and official record-keeping;
- Processing and monitoring of financial assistance and Direct Benefit Transfer (DBT); and
- Monitoring of approved project activities.

### Privacy Commitment

PoCRA is committed to protecting the privacy and personal information of users of the PoCRA DBT App. This Privacy Policy explains how the application collects, receives, accesses, processes, uses, shares, retains, protects, corrects, and deletes information.

Information is processed only to implement, administer, monitor, verify, and deliver PoCRA services, or for purposes permitted or required under applicable law and Government requirements.

## 2. Information Collected and Processed

Depending on the applicable module, user role, and service or activity being processed, the PoCRA DBT App collects or processes the following categories of information, as applicable.

### 2.1 Personal and Beneficiary Information

This may include:

- Name;
- Mobile number;
- Address and contact information;
- Beneficiary or user identification details;
- Application or registration details;
- Farmer and agricultural activity information;
- Land and project-related information;

- Details of proposed, sanctioned, or approved activities;
- Authorized representative details, where applicable; and
- Other information required for determining eligibility, verifying activities, processing applications or proposals, or administering project benefits.

## 2.2 DBT and Financial Information

Where required for processing project benefits or financial assistance, the application may process information relating to:

- Beneficiary or applicant eligibility;
- Bank or payment information required for DBT or financial-assistance processing;
- Approved benefit or assistance amounts;
- Sanction information;
- Benefit-disbursement status;
- Transaction or payment references; and
- Other information required for processing, verification, reconciliation, monitoring, or audit of benefits and financial assistance.

Financial and payment information is processed only for authorized programme, financial-assistance, DBT, reconciliation, monitoring, and audit purposes and is not intended for public disclosure.

## 2.3 Natural Resource Management (NRM) Information

For activities processed through the Natural Resource Management (NRM) Module, the application may process information relating to watershed, conservation, natural resource management, and other approved project interventions.

This information may include:

- Village Action Plan-related activity information;
- Village, project-area, and activity-location information;
- Details of proposed NRM and conservation activities;
- Activity estimates and associated records;
- Technical-sanction information;
- Activity implementation and progress information;
- Field inspection and verification information;
- Geo-tagged photographs and location information;
- Completion and monitoring information; and
- Supporting documents and records required for technical review, sanction, implementation, monitoring, verification, or audit.

NRM information is processed for authorized project planning, technical review, sanction, implementation, inspection, verification, monitoring, programme management, and audit purposes.

Where NRM records contain or are linked to identifiable individuals, the associated personal information will be handled in accordance with this Privacy Policy.

## 2.4 FPO/FPC/SHG and Organizational Information

For activities processed through the FPO Module, the application may process information relating to Farmer Producer Organizations (FPOs), Farmer Producer Companies (FPCs), Self-Help Groups (SHGs), their authorized representatives, applications, and project proposals.

This information may include:

- Name of the FPO/FPC/SHG or applicant organization;
- Organization registration information;
- Registration number and registration date;
- Registered address and related organizational information;
- Name and details of the authorized representative;
- Application or proposal identification details;
- Details of proposed activities or business-proposal components;
- Application, assessment, and appraisal information;
- Supporting documents;
- Inspection and verification information;
- Approval and sanction-related information;
- Financial-assistance information; and
- Bank or loan-account information required for approved assistance, where applicable.

Such information is processed for authorized registration, application or proposal processing, appraisal, verification, inspection, sanction, financial-assistance processing, programme monitoring, administration, and audit purposes.

Where organizational information identifies or is linked to an individual, including an authorized representative, such information will be handled as personal information in accordance with this Privacy Policy.

## 2.5 Location Information

The PoCRA DBT App may collect and transmit device location, including precise GPS location, when required for project-related functionality such as:

- Geo-tagging photographs;
- Recording the location of Individual/Farmer, NRM, or FPO-related project activities;
- NRM activity and work verification;
- Field verification;
- Inspection of project activities;
- Validation of implementation or completion of field-level activities; and

- Programme monitoring and verification.

Location information is accessed through applicable device permissions and is used for authorized project purposes.

If a functionality requires location access while the application is not actively in use, the applicable disclosure will be presented before the relevant permission or consent is requested.

## 2.6 Photographs and Camera Information

The application may access the device camera or photographs for:

- Capturing geo-tagged field photographs;
- Recording implementation, progress, or completion of project activities;
- Recording NRM activity progress or completion;
- Capturing evidence during FPO-related or other authorized inspections;
- Capturing inspection-related evidence;
- Supporting beneficiary, organization, or activity verification; and
- Programme monitoring and record-keeping.

Photographs uploaded through the application may be transmitted to authorized PoCRA systems for processing, verification, monitoring, and retention as part of programme records.

## 2.7 Files and Documents

Users may be required to upload supporting documents through the application for purposes including:

- Individual/Farmer application processing;
- Beneficiary eligibility verification;
- FPO/FPC/SHG registration and application or proposal processing;
- FPO assessment and appraisal;
- NRM activity estimate, technical sanction, implementation, or monitoring;
- Activity verification;
- Inspection;
- Approval and sanction processing;
- DBT or financial-assistance processing;
- Programme monitoring; and
- Administrative, financial, and audit requirements.

Only documents required for the relevant project or programme process should be submitted through the application.

## 2.8 Technical and Diagnostic Information

Limited technical information associated with the application or device may be processed where necessary for:

- Application functionality;

- Authentication and security;
- Troubleshooting;
- Detection and prevention of misuse; and
- Maintenance and performance of the application.

Technical information processed through any integrated library or Software Development Kit (SDK) is subject to the applicable privacy and security requirements described in this Privacy Policy.

### 3. Purpose of Processing Information

Information collected, received, or otherwise processed through the PoCRA DBT App may be used for the following purposes:

#### 3.1 User Registration and Verification

- Register, identify, and authenticate beneficiaries, organizations, and authorized users;
- Process and verify Individual/Farmer DBT applications and beneficiary eligibility; and
- Verify agricultural and project-related activities.

#### 3.2 FPO/FPC/SHG Services

- Register and process FPO/FPC/SHG applications and proposals;
- Assess, appraise, inspect, sanction, and approve FPO-related proposals; and
- Administer and monitor approved FPO activities and financial assistance.

#### 3.3 Natural Resource Management

- Identify and process NRM activities through approved project-planning processes;
- Prepare, process, verify, and monitor NRM activity estimates and technical sanctions; and
- Implement and monitor approved NRM, watershed, and conservation interventions.

#### 3.4 Inspection, Geo-Tagging, and Monitoring

- Conduct field inspections, verification, and monitoring;
- Geo-tag project interventions, activities, works, and photographs;
- Verify and manage supporting photographs, documents, and programme records; and
- Monitor the implementation, progress, and completion of approved activities.

#### 3.5 Benefits, Records, and Compliance

- Process, verify, reconcile, and monitor eligible DBT benefits and financial assistance;
- Maintain official programme, financial, transaction, and audit records;
- Prevent and detect unauthorized access, misuse, fraud, or irregularities;
- Resolve grievances, technical issues, application-related issues, and beneficiary- or organization-related issues;
- Operate, secure, and maintain the application; and
- Comply with applicable administrative, financial, audit, statutory, legal, and Government requirements.

Personal information will not be used for unrelated commercial advertising or marketing purposes.

## 4. Permissions Used by the App

The PoCRA DBT App may request device permissions necessary for particular application features.

### 4.1 Location

Location permission may be requested for geo-tagging, Individual/Farmer activity verification, NRM activity verification, field inspection, FPO-related inspection where applicable, and validation of the location of project activities.

### 4.2 Camera

Camera permission may be requested for capturing field photographs, NRM activity photographs, FPO-related inspection evidence, activity-completion evidence, or other photographs required as part of authorized programme processes.

### 4.3 Photos, Media, and Files

Access may be requested where necessary to select, capture, access, or upload photographs and supporting documents required for Individual/Farmer applications, NRM activities, FPO applications or proposals, inspections, processing, or verification.

### 4.4 Internet and Network Access

Network access is required for communication with authorized application servers, Government systems, APIs, and other services necessary for application functionality.

### 4.5 Notifications

Notification permission may be requested, where applicable, for application-related alerts, updates, and service information.

Users may manage applicable permissions through their device settings. Disabling a permission required for a particular functionality may limit or prevent that functionality from operating.

## 5. Prominent Disclosure and User Consent

Before requesting permission or consent to access personal or sensitive information, the PoCRA DBT App will provide an appropriate in-app disclosure where required by the nature of the information and applicable platform requirements.

The disclosure will clearly identify:

- The information to be accessed or collected;
- The purpose for which it is required; and
- Any affirmative action the user must take to provide consent.

## 6. Sharing and Disclosure of Information

Information collected, received, or otherwise processed through the PoCRA DBT App may be disclosed or transferred, where necessary and authorized, to:

- Authorized PoCRA officials and field functionaries;
- Authorized departments and offices of the Government of Maharashtra;
- Government systems or platforms required for implementation of Individual/Farmer DBT, NRM, FPO, or other approved programme services;
- Authorized technical, appraisal, inspection, sanctioning, or programme authorities involved in relevant project workflows;
- Authorized financial or payment institutions where required for DBT or financial-assistance processing;
- Authorized technology or service providers supporting the operation, hosting, security, maintenance, or functionality of the application; and
- Competent Government, regulatory, audit, judicial, or law-enforcement authorities where disclosure is required or permitted under applicable requirements.

Information disclosed to service providers will be limited to information required for performing the relevant authorized service.

Personal and sensitive user information processed through the application will not be sold for monetary consideration or used for unauthorized commercial marketing purposes.

## 7. Third-Party Services, APIs, and SDKs

The application may communicate with authorized Government systems, financial systems, APIs, service providers, or other approved digital services where necessary for:

- Beneficiary, organization, or application verification;
- Individual/Farmer DBT processing;
- NRM planning, technical processing, sanction, implementation, or monitoring;
- FPO/FPC/SHG application, appraisal, inspection, assistance, or monitoring;
- Financial-assistance processing;
- Programme administration;
- Authentication;
- Monitoring;
- Security; or
- Delivery of approved project services.

Where service providers process personal information on behalf of PoCRA, such processing will be limited to authorized purposes connected with the operation or delivery of the relevant service and subject to applicable privacy, security, contractual, and Government requirements.

Third-party libraries, APIs, or SDKs incorporated into or used in connection with the application are subject to appropriate review regarding their handling of user information.

## 8. Data Security

PoCRA applies reasonable administrative, technical, and organizational safeguards to protect personal and sensitive information processed through the PoCRA DBT App.

These safeguards are proportionate to the nature and sensitivity of the information and applicable Government security requirements. They are designed to:

- Prevent unauthorized access, use, alteration, disclosure, loss, misuse, or destruction;
- Restrict access to authorized users, officials, service providers, and systems with a legitimate programme-related need;
- Protect information transmitted between the app and authorized systems through appropriate secure communication mechanisms; and
- Safeguard beneficiary, financial, location, photograph, document, NRM, FPO, and other programme information from unauthorized access or disclosure.

## 9. Data Retention

Personal information and applicable programme records will be retained only for as long as necessary for relevant programme, administrative, financial, audit, legal, security, or Government record-retention purposes, including:

- Individual/Farmer application and benefit processing;
- Beneficiary eligibility verification;
- FPO/FPC/SHG registration, application, appraisal, sanction, financial-assistance, and monitoring records;
- NRM activity, estimate, technical-sanction, implementation, inspection, and monitoring records;
- Field inspection and programme monitoring;
- Administration of approved benefits and financial assistance;
- DBT and financial reconciliation;
- Resolution of grievances or disputes;
- Prevention and investigation of fraud or misuse;
- Audit and financial-control requirements; and
- Applicable statutory, legal, and Government record-retention requirements.

When retention is no longer necessary or required, applicable information may be deleted, anonymized, archived, or otherwise disposed of in accordance with applicable Government policies, programme requirements, and law.

Certain official programme, application, sanction, financial, transaction, inspection, NRM, FPO, audit, or statutory records may continue to be retained where required for legitimate administrative, legal, financial, security, fraud-prevention, audit, or regulatory purposes.

## 10. Data Correction and Deletion Requests

Users, beneficiaries, authorized representatives, and other eligible users may request correction of inaccurate personal information or deletion of eligible personal information associated with the Individual/Farmer DBT, NRM, or FPO modules of the PoCRA DBT App.

Requests are subject to verification of the identity and, where applicable, authority of the person making the request, as well as applicable programme, administrative, financial, audit, statutory, legal, security, and Government record-retention requirements.

### 10.1 Correction Requests

Users may request correction of inaccurate or incomplete personal information through the designated application support, grievance, profile, or other authorized mechanism made available by PoCRA.

### 10.2 Personal Data and, Where Applicable, Account Deletion Requests

Users may request deletion of eligible personal information by emailing the designated PoCRA contact, submitting a request through local officials, or visiting the relevant local office.

Where the PoCRA DBT App enables a user to create an app account, the user may request deletion of that account and associated eligible personal information, subject to applicable legal, financial, audit, programme, security, and Government record-retention requirements.

Following receipt and verification of a valid request, personal information eligible for deletion will be deleted or anonymized in accordance with applicable requirements.

Certain information may continue to be retained where necessary or required for:

- Compliance with applicable laws or Government requirements;
- Government record-retention requirements;
- Individual/Farmer applications and DBT records;
- FPO/FPC/SHG applications, appraisals, approvals, sanctions, and financial-assistance records;
- NRM estimates, technical sanctions, implementation, inspection, and monitoring records;
- Financial, payment, transaction, and reconciliation records;
- Audit and financial-control requirements;
- Prevention or investigation of fraud, misuse, or security incidents;
- Resolution of disputes, grievances, or claims; or
- Administration, verification, and audit of benefits, assistance, activities, or works already processed, approved, sanctioned, or implemented.

Any information retained following a deletion request will be limited to information required for the applicable purpose and will subsequently be handled or disposed of in accordance with applicable programme, Government, legal, financial, audit, security, and record-retention requirements.

## 11. User Responsibilities

Users should:

- Provide accurate information when using the application;
- Submit authentic and relevant information and documents for the applicable Individual/Farmer, NRM, or FPO process;
- Use the application only for authorized purposes;
- Protect login credentials, OTPs, and devices from unauthorized access;
- Avoid sharing confidential authentication information with unauthorized persons; and
- Promptly report suspected unauthorized access or misuse through the designated PoCRA support or grievance mechanism.

## 12. Children's Privacy

The PoCRA DBT App is intended for the implementation and administration of Government programme activities and is not designed or directed toward children.

Eligibility for programme benefits and services is governed by applicable PoCRA programme guidelines and requirements.

## 13. Changes to This Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in:

- Application functionality;
- Individual/Farmer DBT, NRM, FPO, or other programme requirements;
- Technology or system integrations;
- Data-handling practices;
- Applicable Government policies; or
- Legal and regulatory requirements.

Any updated Privacy Policy will be made available through the application, official website, or other appropriate Government channel.

The Last Updated date appearing at the beginning of this Privacy Policy will indicate the latest revision.

## 14. Contact and Grievance Mechanism

For privacy questions, concerns, grievances, correction requests, or deletion requests relating to the Individual/Farmer DBT, NRM, or FPO modules, contact:

Project on Climate Resilient Agriculture (PoCRA)

Department of Agriculture

Government of Maharashtra

Office **address:**

Nanaji Deshmukh Krushi Sanjivani Prakaalp,

30-B, Arcade, World Trade Centre

Cuffe Parade, Mumbai – 400005, Maharashtra, India

**Privacy/Grievance email:** [pocra.apps@gmail.com](mailto:pocra.apps@gmail.com)

**Data/account deletion request:** User can raise the request through local officials and email.

Users submitting a privacy, correction, grievance, or deletion request may be required to provide sufficient information to enable PoCRA to identify the relevant application or account and verify the identity or authority of the requester before acting on the request.

Requests will be handled subject to applicable programme requirements, Government procedures, legal obligations, financial and audit requirements, security considerations, and record-retention requirements.

## 15. Privacy Policy Availability

This Privacy Policy will be made available:

- Through the PoCRA DBT App;
- Through the privacy policy link provided on the Google Play Store listing; and
- Through the designated official PoCRA web page.

This Privacy Policy applies to the information-handling practices associated with the Individual/Farmer DBT, Natural Resource Management (NRM), and FPO modules of the PoCRA DBT App.

## 16. Policy Acceptance

Use of the PoCRA DBT App, including the Individual/Farmer DBT, NRM, and FPO modules, is subject to this Privacy Policy and applicable programme requirements.

Where consent is required for access to or processing of personal or sensitive information, the application will provide the applicable disclosure and consent mechanism before such access or processing occurs.