

## **TSS Consultancy India - Privacy Notice Pursuant to the Digital Personal Data Protection Act, 2023**

TSS Consultancy Private Limited (hereinafter referred to as TSS CONSULTANCY) recognizes and understands the significance of your privacy. As such, we are committed to protect the personal information of Data Principals, which includes, but is not limited to, customers, employees, job applicants, and visitors to our website.

This Privacy Policy applies to our website (collectively, our 'Service'). By accessing or using our service, you signify that you have read, understood, and agreed to our processing of your personal information in accordance with the Privacy Policy and terms of service.

In recognition of the critical need for personal data protection and TSS CONSULTANCY's commitment to the Indian Data Protection Law, TSS CONSULTANCY has established this Privacy Notice to ensure the secure management of any personal information received or collected by us.

This Privacy Notice outlines the categories of personal information collected by TSS Consultancy, the grounds of such processing, applicable safeguards as well as the mechanism of how you may exercise your data protection rights with respect to processing of your personal information.

### **Our Commitment to You:**

We are committed to ensure transparency in the management of your personal information. In doing so, we adhere strictly to the obligations set forth by the Digital Personal Data Protection Act, 2023.

For our employees, job candidates, and website visitors, we act as a Data Fiduciary in accordance with the DPDP Act, as we determine the purpose and means of processing their personal data.

When our customers use our software services:

- They act as the Data Fiduciary for their customers' personal data, as they determine the purpose of data collection and processing
- We act as a Data Processor, processing personal data only under our customers' instructions
- Our role is limited to processing data according to the service agreement with our customers

As both a Data Processor and a Data Fiduciary (for specific categories of individuals), we take our responsibilities seriously and maintain robust privacy protection measures. Your privacy is important to us, and we are committed to protecting personal information in all our roles under the DPDP Act.

### **Protecting Your Personal Data**

TSS Consultancy is committed to protect your information by handling it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

### **Information We Disclose to Others**

We share your Personal Data strictly as described in this Privacy Notice. This includes sharing data with our affiliates, regulatory authorities, subsidiaries, service providers, financial and transaction partners, philanthropic and advocacy partners, professional advisors, your representatives, and in circumstances involving mergers or amalgamations.

### **Purpose of collecting Personal Data**

TSS Consultancy collects and processes your personal data only with your consent or when permitted by the legitimate grounds of processing under DPDPA.

We collect and process your personal data to provide and maintain our service, including managing

your account, fulfilling contractual obligations and monitoring usage. This data enables us to contact you through various communication channels, such as email, phone calls, SMS, and push notifications. Additionally, we use your data to inform you about news, special offers, similar goods or services and to manage your request, after receiving your consent in compliance with the Digital Personal Data Protection Act (DPDP), 2023.

We collect and process your personal information for various purposes, as described below under specific lawful grounds on which we may collect, process, and/or disclose your personal information, the following list shows the various processing purposes for personal data here at TSS Consultancy:

<b>Sr No</b>	<b>Categories of Personal Data Collected</b>	<b>Lawful Grounds for Processing</b>	<b>Purpose of collection</b>
1	1. Business and personal contact details (e.g., name, postal information, email address, phone number etc.) 2. Details about Organisation (Name of organisation, title of person, address etc.) 3. Usage Data 4. Demographic Information (E.g., age, race, gender, citizenship) 5. Content from electronic communication (e.g., emails)	The lawful ground for data processing is your explicit consent pursuant to Section 6 DPDPA. You have the right to withdraw your consent at any time with effect for the future.	In order to access data on websites (such as information obtained through the "Contact Us", "Message Us", "Subscribe to Our Newsletter" sections, "Request info" or for any other ancillary reasons) for the purpose of availing the goods and services offered by the organization ( <a href="https://www.trackwizz.com">https://www.trackwizz.com</a> )
2	In addition to the category of personal data mentioned in serial number 1, the other documents required include: 1. Financial details (e.g., date of birth, banking information, account numbers, taxpayer ID, tax residence, investment-related information) 2. Government-issued identifiers (e.g., for identification, Aadhar card, Pan Card and security checks)  3. Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data, the	"The lawful ground for data processing is primarily your explicit consent, as per Section 6 of the DPDPA. However, we may also process your data based on other lawful grounds permitted under applicable Indian laws, such as when it is necessary for contractual performance, legal compliance, or to protect vital interests.  You have the right to withdraw your consent at any time, but this withdrawal	PII is collected while using product or service for ensuring smooth functioning, provide personalized services, ensure platform security, and comply with legal and regulatory requirements.

	type of mobile device, mobile operating system etc.	will not affect the lawfulness of processing based on other valid grounds."	
3	<p>1. Professional and employment data (e.g., resume, employment history, education, work authorization etc.)</p> <p>2. Account information</p> <p>3. Electronic Communication (e.g., email id)</p>	<p>"The lawful ground for data processing is primarily your explicit consent, as per Section 6 of the DPDPA. However, we may also process your data based on other lawful grounds permitted under applicable Indian laws, such as when it is necessary for contractual performance, legal compliance, or to protect vital interests. You have the right to withdraw your consent at any time, but this withdrawal will not affect the lawfulness of processing based on other valid grounds."</p>	<p>Applicants/ Careers page on our website serves as a comprehensive resource for job applicants seeking positions with us.</p>
4	<p>1. We, along with third parties acting on our behalf may collect information about your online activities over time and across third-party websites to provide you with advertising tailored to your interests.</p> <p>2. Business Contact details</p> <p>3. Other information (e.g., email alerts, forms, online registration)</p>	<p>The lawful ground for data processing is your explicit consent pursuant to Section 6 DPDPA.</p> <p>You have the right to withdraw your consent at any time with effect for the future.</p>	<p>Other websites or applications that may link to this Privacy Notice (the "Sites")</p>
5	<p>In addition to the category of personal data mentioned in serial number 1, the other documents required include:                  CCTV footage</p>	<p>The lawful ground for this data processing is legitimate use of TSS Consultancy pursuant to Section 7 DPDPA.</p>	<p>Video Surveillance for security reason of everyone who visits our organization</p>

6	In addition to the category of personal data mentioned in serial number 1, the other documents required include: Information from third-party data providers and public sources (e.g., for marketing campaign, compliance and background screening)	<p>The lawful ground for data processing is your explicit consent pursuant to Section 6 DPDPA.</p> <p>You have the right to withdraw your consent at any time with effect for the future.</p>	For the purpose of providing better services to the data principal, particularly when they are the point of contact with a third party or where such services are necessary to ensure the smooth functioning of services, we collect and utilize their relevant data.
7	Electronic communication (e.g., Email address)	<p>The lawful ground for data processing is your explicit consent pursuant to Section 6 DPDPA.</p> <p>You have the right to withdraw your consent at any time with effect for the future.</p>	Learning platforms: to ensure the employees have better access to various learning programs and to make them aware about their rights and duties along with professional enrichment courses

### Your Rights as a Data Principal under the Digital Personal Data Protection Act (22 of 2023)

You retain control over your personal data, and we are steadfast in upholding your fundamental right to data privacy. The Digital Personal Data Protection Act 2023 confers upon your specific rights concerning your personal information which are enumerated hereunder.

#### 1. Right to Information Access

While we strive to be transparent about how we use your data, providing a complete summary of all your personal data, processing activities, and third-party sharing details can be resource-intensive. We are committed to providing you with relevant information about your data upon request, subject to reasonable limitations and any applicable legal restrictions.

Additionally, we provide clear documentation on how we utilize your information across our lending services, ensuring complete transparency in our data handling practices.

It is important to mention that this does not apply to any sharing of personal data by TSS Consultancy with another data fiduciary authorized by law to obtain such information, where sharing is based on a written request for the purpose of preventing, detecting, investigating offenses or cyber incidents, or for the prosecution or punishment of offenses.

#### 2. Right to Data Rectification and Removal

We empower you to maintain control over your personal information through multiple channels. You may direct us to correct any inaccuracies in your personal information, update incomplete, irrelevant or inaccurate data in our systems, and request complete erasure of your personal data from our records which is no longer necessary for the purpose for which it was processed unless retention is necessary for a legal purpose. We process all such requests with utmost priority while maintaining compliance with applicable regulations and law of the land.

### 3. Grievance Resolution Rights

We maintain a robust grievance redressal framework focused on protecting your privacy interests. This includes a dedicated data protection channel at TSS Consultancy and a structured grievance redressal mechanism.

You have the right to register your grievances with us in respect of any act or omission regarding the performance of TSS Consultancy obligations in relation to fair processing of your personal data or the exercise of their rights under the DPDP. Our team upholds a strict commitment to address and resolve all privacy-related concerns within 60 business days of receipt, ensuring prompt and effective resolution of your queries.

### 4. Nomination Rights

You retain the right to designate a nominee who shall exercise these rights on your behalf, ensuring continuity of data protection in the event of incapacity or death.

This nomination can be modified at any time through our formal processes, providing you with flexibility in managing your data protection preferences and rights.

At TSS Consultancy, we manage your data rights requests promptly as per DPDP Act 2023 guidelines. To protect your privacy, we verify your identity before processing any requests. If we require additional time beyond standard processing periods, we will inform you of the expected completion date. In cases where we cannot fulfill a request, we will provide a clear explanation for such rejection. For assistance, contact our Data Protection Officer at [dpo@tssconsultancy.com](mailto:dpo@tssconsultancy.com)

### Retention and Deletion

We ensure that your Personal Data is accurate and kept up to date. TSS Consultancy retains Personal Data for as long as necessary to provide access to and use of the website or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types and purposes, actual retention periods can vary significantly.

Even if we delete your Data, it may persist on backup or archival media for audit, legal, tax or regulatory purposes.

### Data Transfer Outside India

TSS Consultancy does not transfer data outside India as per the regulatory compliance but still in rarest cases if allowed by the Regulatory authority or if data is mandated by law to be shared then in such cases, TSS Consultancy will ensure secure and compliant transfer of personal data beyond Indian borders in accordance with the Digital Personal Data Protection Act 2023.

We implement robust safeguards through:

- Adherence to transfer regulations specified by the Data Protection Board of India
- Compliance with governmental restrictions on data flows to notified countries.
- Implementation of prescribed contractual safeguards for permitted international transfers.
- Regular monitoring of cross-border data protection requirements

We maintain transparency in our international data processing activities and undertake transfers only to countries approved by the Central Government.

### Changes to this Privacy Notice.

This Privacy Notice is subject to modification in response to changes in our privacy practices or upon notification from governmental authorities. In the event of any amendments, the revised notice will be published on this website.

### **Duration of storage**

Your personal data will be retained for the duration required by applicable laws and regulations, including organizational retention periods and statutory limitation periods. This may extend beyond the completion of the specific purpose for which it was initially collected.

While we strive to minimize data retention, we may also retain your data for other legitimate business purposes, such as improving our services, preventing fraud, and conducting research and analysis.

We will securely store and protect your data during this retention period and will delete it systematically once it is no longer required for these purposes."

### **Link to other Websites**

Our websites may feature buttons or tools that link to services provided by other companies. We encourage you to review the privacy policies of these external sites, as they may have their own privacy statements in place. Please note that we cannot be held responsible for the privacy practices of these external sites.

### **Data Protection Officer**

The responsible party for the processing and protection of your personal data is TSS CONSULTANCY India.

If you have any questions regarding data protection or questions relating to the processing of your personal data or the exercise of your rights, please contact us by either using the contact form at the bottom of this page or at the following address, telephone number or email address:

Corporate Data Protection Officer  
Poonam Yadav  
TSS CONSULTANCY - India

E-mail: [dpo@tssconsultancy.com](mailto:dpo@tssconsultancy.com) (Please do not send confidential content via email)

### **How to Submit a Request**

To submit an access, correction or deletion request, you can use our online form and in order to submit a request as an authorized agent on behalf of a consumer, contact us at [dpo@tssconsultancy.com](mailto:dpo@tssconsultancy.com).

For questions or concerns about our privacy notices and practices, contact us at [dpo@tssconsultancy.com](mailto:dpo@tssconsultancy.com).

### **Disclaimer**

Please note that only individuals who are 18 years of age or older, and who have the capacity to access our platform, are permitted to share personal data with us.