

# Touchcore Systems

## Privacy Notice

(Updated as of May 09, 2024)

Before using this website, please read this policy provided hereinbelow. Use of this website constitutes acceptance of the terms of this policy. We reserve the right to update the terms of this policy and such changes will be posted on this page. As a company engaged in software development, Mobile and IoT based services, data science and machine learning, cloud infrastructure and devops, quality assurance as well as related services to clients globally, **Touchcore Systems** (the Company) is committed to protecting the privacy and “Personal Data” (any Data about an individual who is identifiable by or in relation to such Data) of its customers, employees, affiliates etc. This Privacy Notice applies only to information collected through the website and not to information that may be collected offline. We periodically review all privacy and security policies and update them, when necessary, in line with changes of the General Data Protection Regulation, 2018 (GDPR), The Digital Personal Data Protection Act 2023 (DPDPA), as well as any other applicable law as per the processes carried out by the company, imposing obligations on its privacy compliance.

### 1) What information do we collect?

When you use our website, we collect basic information including your name, contact information, employment information to process vacancy requirements, nature of business or any other information you chose to provide to us in reference to market surveys or for responding to general queries made by you. We do not intend to collect more personal information from users upon their access to our website. However, certain data may be collected from the device on which you use this website including but not limited to technical information, such as configuration information made available by your web browser or other programs you use to access the Platform etc.

### 2) Automatically Collected Information:

We may also collect certain information automatically when you use our website or services, including:

- i. IP address
- ii. Device information (such as device type, operating system, and browser type)

- iii. Log data (such as access times, pages viewed, and referring URL)
- iv. Cookies and similar tracking technologies.

### **3) Obtaining Consent:**

We obtain your consent through clear and affirmative actions, such as ticking a box, clicking on "I agree" button, or providing explicit consent in writing. We provide you with clear and transparent information about the purposes for which we collect and process your personal data, as well as any third parties with whom we may share your information.

### **4) Managing Consent Preferences:**

You have the right to manage your consent preferences and change your consent settings at any time. We provide you with mechanisms to easily withdraw your consent, such as through the settings of your account or by contacting us directly. We honour your withdrawal of consent without undue delay and cease processing your personal data for the specified purposes.

### **5) Record of Consent:**

We maintain records of your consent, including the date, time, and method of obtaining consent, as well as the information provided to you at the time of consent. These records help us demonstrate compliance with data protection laws and respond to any inquiries or complaints regarding consent management.

### **6) Children's Consent:**

If you are under the age of consent specified by applicable data protection laws in your jurisdiction, we obtain consent from your parent or legal guardian before collecting, using, or disclosing your personal information. We provide appropriate mechanisms for parents or guardians to provide or withdraw consent on behalf of their children.

### **7) What do we do with your information?**

Any of the information we collect from you enables us to respond to your general queries, improve our website user experience, send updates in the form of mailers, contact for survey or feedback, to execute other activities such as marketing campaign signs, and promotional communications for which consent is taken appropriately. We also use your information for non-targeting reasons such as frequency capping, compliance, market research or business development purposes. If at

any time you would like to unsubscribe from receiving such general emails in the future, we include unsubscribe instructions at the bottom of each such general email.

#### **8) Do we transfer information to third-parties?**

We may share your personal information with third parties for the following purposes:

- **Service Providers:** We may share your information with third-party service providers who assist us in operating our business and providing our services.
- **Business Partners:** We may share your information with trusted business partners for joint marketing activities and other business purposes.
- **Legal Compliance:** We may disclose your information to comply with applicable laws, regulations, legal processes, or government requests.
- **Business Transfers:** We may transfer your information in connection with a merger, acquisition, restructuring, or sale of assets.
- **Other than the persons working for or with us,** your information may also be passed on to third parties that perform services for us such as information technology suppliers, security providers, special consultants, etc.

#### **9) Retention of Personal Data**

The company retains Personal Data for as long as necessary to provide the access to and use of the website, or for other essential purposes such as complying with our legal obligations, carrying out business activities, promotions etc. 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.

#### **10) Your Rights**

When we process Data about you, we do so with your consent and/or as necessary to provide the website you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of the company as described in this privacy statement. Below, you will find additional privacy information that you may find important. The company adheres to applicable Data protection laws internationally, including in India which if applicable include the following rights in relation to your Data, including:

- **Right to access –**
  1. the right to request copies of the information we hold about you at any time, or

2. That we modify, update or delete such information.
3. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is manifestly unfounded or excessive. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - Right to correct – the right to have your Data rectified if it is inaccurate or incomplete.
  - Right to erase – the right to request that we delete or remove your Data from our systems.
  - Right to restrict our use of your Data – the right to limit the way in which we can use it.
  - Right to Data portability – the right to request that we move, copy or transfer your Data
  - Right to object – the right to object to our use of your Data including where we use it for our legitimate interests.

For information about managing your contact Data, email subscriptions and promotional communications, please submit a request to us at [hello@touchcoresystems.com](mailto:hello@touchcoresystems.com) It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

#### **11) What measures do we use to protect your information?**

We endeavour to uphold physical, technical and procedural safeguards that are appropriate to protect your information against loss, misuse, copying, damage or modification and unauthorized access or disclosure. We restrict access to Personal Data, to our employees, agents, affiliates and service providers who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations, and who may be disciplined or whose relationship with us may terminate, if they fail to meet these obligations. We take reasonable measures to protect customer information from unauthorized access, use, disclosure, alteration, or destruction. However, no method of transmission over the Internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

#### **12) Cross-Border Flow:**

For Indian Data Principals. the transfer of data outside India shall happen only to countries which have been approved by the Central Government by notification. The Indian Data Principals must consent to such transfer of personal data and the same shall be a necessity for the performance of the purposes for which the data principals have consented to. With respect to European Data

subjects, cross border transfer of data shall be carried out based on adequacy decisions, i.e., decisions on the appropriate level of data protection in a third-party country.

### **13) What are your rights?**

You are entitled to request details of your information with us and are entitled to rectify details of your information if you believe they are inaccurate or incomplete. If at any time you wish to withdraw your consent about us possessing your information, please write to us at [hello@touchcoresystems.com](mailto:hello@touchcoresystems.com).

### **7. How do we obtain your consent?**

By using the Website, you consent to our online privacy notice.

### **8. Changes to our Privacy Notice**

If we decide to change our Privacy Notice, we will update the Privacy Policy Notice date below.