WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE

Tata Consultancy Services Limited (hereinafter referred to as "TCS" "us" "we" or "our") is committed to respecting your privacy and complying with applicable data protection and privacy laws.

This Privacy Notice is intended to help you understand how we collect, use, and protect the information you provide (including any personal information) during the download and installation process, and during the time while you are logged in our mobile application “TCS Vehicle Tracking System” (hereafter referred to as TVTS application). Please read this Privacy Notice carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY NOTICE, PLEASE DO NOT ACCESS THE APPLICATION.

Individuals who install and access our mobile application through their mobile devices are referred to as "TVTS Application User/s or “You”. Collectively, the information collected about any such user or group of users is referred to as "Information" or “Data” (this may include personal data also).

The driver’s mobile device wherein TVTS application is being installed and used for executing the trips is referred to as VMU (Vehicle Mounted Unit) device or driver device.

It is important that you read this Privacy Notice, together with any other statement we may provide on specific occasions when we are collecting or processing the information you are providing us and/or the data gathered through your active TVTS application session, so that you are aware of how and why we are using such information.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (aka anonymous data). We have the following categories of personal data about you:

- Name
- Address details.
- Contact details (mobile phone number).
- Details of your Driving License.

THE KIND OF INFORMATION WE ARE COLLECTING

The primary purpose of TVTS application is to execute the trips for TCS associates from associates’ geo coded location to TCS office (and vice versa), through secure boarding and alighting mechanism.

Apart from the information entered into the application during login procedures such as your mobile number, we shall also collect the below information all the time whilst an active trip is being executed in TVTS application:

- GPS Data including location timestamps of VMU (Vehicle Mounted Unit) mobile device.

HOW IS YOUR PERSONAL DATA COLLECTED

We may collect information about you in a variety of ways. The information we collect via the application may also depend on whether there is any active trip running in the TVTS application.

Derivative Data

Information our servers automatically collect once you log into TVTS Application and/or when you are executing a trip in the TVTS application such as the date and time of TVTS Application Users' login into the TVTS application and the timestamps of VMU device location at regular intervals during navigation of the trip, being executed in the application.

Device Location Services

The TVTS application needs enabling GPS in VMU mobile device and "Allow All the Time" permission set for TVTS application to leverage device location services even when the app is in background, closed or not in use.

Mobile Device Data

Device information such as your mobile device ID.

HOW WE WILL USE INFORMATION ABOUT YOU

All TVTS Application Users' information resides in our database primarily for the purpose of executing eTMS trips (planned and unplanned). We will analyze and publish data, for use within TCS only, at different levels of aggregation.

TVTS application users are required to enable device GPS to be able to show the route navigation based on real time traffic conditions for the travel between the source and destination including the way point locations of the trip being executed.

The location tracking of VMU mobile device will start as soon as the trip is started in the TVTS application and will be stopped as soon as the trip is marked as ended in TVTS application. This is needed to Board and Alight associates precisely at their geo coded location and/or TCS office during the Pickup as well as Drop Trips.

The "Allow All the Time" location permission allowed for TVTS application will also be used for deriving additional insights to be able to monitor, track and analyze the trip on various parameters such as any deviations in the route planned for the trip, and/or if there are any delays in the trip etc.

If at any point we intend using any information in a manner that deviates from this Privacy Notice, we will provide notice of how we intend using that Information when we collect it. That specific Information will be solely as stated in such alternative disclosure.

Situations in which we will use your personal data.

Your personal information such as your name, mobile number, mobile device ID etc. will be used only for the following purposes:

1. To let you perform your duties i.e. executing the eTMS trips as assigned. (Planned or Unplanned).
2. Compile statistical data for the analysis of Non-Compliant Data Subjects for Internal Use Only.
3. Increase the efficiency and operation of the Application.
4. Monitor and analyze usage and trends to improve your experience with the Application.
5. Notify you of updates to the Application.
6. Request feedback and contact you about your use of the Application.
7. Resolve disputes and troubleshoot problems.
8. Solicit support for the Application.

If you fail to provide personal data

If you fail to provide certain information when requested or object processing of your personal data, we may not be able to perform/comply with our commitments such as assigning you trips during eTMS trip planning procedures.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for any purpose other than the one for which it was originally collected, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data

and to treat it in accordance with the law. If we do, you can expect a similar degree of protection in respect of your personal data.

DATA SECURITY

We have put in place measures to protect the security of your Information. We use a variety of verified security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure.

We have put in place appropriate administrative, technical, and physical security measures to prevent your Personal Data from being accidently lost, used or accessed in an unauthorized way, altered or disclosed.

In addition, we limit access to your Personal Data only to those TCS employees who have a business need to know.

DATA RETENTION

We will retain your personal data including eTMS trips you have executed for 7 Years. This is as per management reporting and analytics purposes. This retention period may change based on the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Once it is no longer required, we will securely destroy your personal data in accordance with our data retention and disposal policy.

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DATA SUBJECT/YOUR RIGHTS

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your use of TVTS application.

Under certain circumstances by law, you have the right to:

- Request access to your Personal Data (commonly known as a “Data Subject Access Request”). This enables you to receive a copy of the Personal Data we hold about you .
- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 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 exercised your right to object to processing (See below).

- Object to processing of your Personal Data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your Personal Data to another party.
- Request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

If you want to exercise a data subject right, please contact us on the email id provided in the below section.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the Information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

FOR DATA PROTECTION/PRIVACY CONCERNS WRITE TO

If you have a privacy concern, complain or a question regarding this Notice, please direct it to the Global Privacy Office of TCS at tcs.cpo@tcs.com.

CHANGES TO THIS PRIVACY NOTICE

As we are constantly improving and upgrading our services, we retain the right to modify this privacy notice at any time. In the event we make such changes, we will announce the changes and update the new privacy notice on the application menu. Information collected after the new privacy notice is posted will be used in conformance with the new privacy notice. Information gathered under a previous privacy notice will continue to be used in conformance with that version of the privacy notice unless we notify TVTS Application users of the changes.

CONTACT

If you have any questions about TVTS application, please contact Branch Admin Head or write to us at etms.support@tcs.com