



Privacy Program Policy

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1. Purpose

The Privacy Program Policy establishes a comprehensive framework for managing personal data at 2COMS. 2COMS ensures that all employees and third-party partners fully understand their responsibilities regarding data protection and privacy. This policy fosters a culture of awareness, compliance, and accountability with applicable laws and regulations across all operations.

2. Scope

This policy applies to all employees of 2COMS, including full-time, part-time, and temporary staff, as well as third-party vendors and partners involved in the collection, processing, or storage of personal data on behalf of 2COMS. All personnel at 2COMS adhere strictly to this policy as part of their data handling responsibilities.

3. Collection of Data

2COMS collects only the information necessary for business purposes.

- Types of Data Collected: 2COMS collects personal data such as names, contact information, and demographic details relevant to our services.
- Purpose of Collection: All personal data is collected exclusively for legitimate purposes, including service provision and compliance with legal obligations.
- Methods of Collection: Data is collected through online forms, customer interactions, surveys, and third-party sources, ensuring complete transparency and ethical practices.

4. Notice and Processing

2COMS maintains full transparency in all data processing activities.

- Privacy Notices: Clear and detailed privacy notices are always provided at the point of data collection, explaining what data is collected, how it is used, and individuals' rights.
- Processing Activities: Personal data is processed strictly for the purposes for which it was collected, ensuring lawful and fair treatment.
- Updates to Notices: Privacy notices are updated whenever significant changes occur, and all affected individuals are promptly informed.

4a. Notice and Processing: Notice and Disclosure

2COMS is committed to transparency and fairness in how personal data is collected, processed, and disclosed. All practices are designed to uphold high standards of compliance and responsible handling of information.

Notice

- **Clear Communication:**
Individuals are informed, at the time of data collection, about what information is being collected, why it is needed, and how it will be used.
- **Accessibility:**
Notices are provided in clear, simple, and accessible language, and made available in formats that ensure easy understanding for all stakeholders.

- **Medium of Delivery:**
Notices are shared through the same channels used to collect data — such as online forms, mobile applications, HR systems, recruitment portals, or in-person forms.
- **Updates:**
Whenever there are material changes in how data is processed or shared, updated notices are issued promptly to affected individuals.

Disclosure

- **Purpose-Driven Disclosure:**
Personal data is disclosed only for purposes that have been communicated to the individual at the time of collection.
- **Third-Party Sharing:**
 - Data shared with service providers, partners, or vendors is strictly limited to what is necessary to fulfil the defined purpose.
 - All third parties handling personal data are required to maintain confidentiality and implement appropriate safeguards.
- **Authorities and Legal Requests:**
Information is disclosed to authorised agencies or regulators only when legally required, and such disclosures are carefully logged and monitored.
- **Cross-Border Data Transfers:**
If data is transferred outside the country, individuals are informed and the transfer is carried out with appropriate safeguards to ensure protection.
- **Incident Notifications:**
In the event of a security incident or breach, relevant stakeholders and affected individuals are notified promptly, and corrective measures are implemented without delay.

Accountability Measures

- **Contractual Safeguards:**
Any party receiving data under contract must adhere to equivalent data protection standards.
- **Monitoring & Audits:**
Regular reviews and audits are conducted to ensure that all notices and disclosures are aligned with stated purposes and compliance requirements.
- **Transparency Records:**
Internal logs of notices issued, disclosures made, and grievances raised are maintained to support accountability and continual improvement.

4b. Notice and Processing: Resell or Repurpose Data

2COMS values trust and is committed to ensuring that personal data is never misused. Data entrusted to the organisation is handled strictly within the boundaries of what has been

communicated to individuals, and is never resold or repurposed without proper justification, safeguards, and transparency.

Resell of Data

- **No Unauthorised Sale:**
Personal data is never sold or monetised without the individual's prior knowledge and explicit agreement.
- **Third-Party Transactions:**
Where data must be shared for business purposes (such as with partners, affiliates, or service providers), it is done only under clear contractual safeguards that prohibit further resale or misuse.
- **Transparency:**
Individuals are informed if their data may be part of any transaction or transfer involving a change of ownership, merger, or acquisition, and are provided with appropriate information about continued protection of their rights.

Repurposing of Data

- **Purpose Limitation:**
Data is processed only for the specific purposes for which it was collected and communicated at the time of collection.
- **Secondary Uses:**
If data needs to be used for a new purpose beyond the original one, the new purpose is carefully evaluated to ensure compatibility, and individuals are notified in advance. Where required, fresh consent is obtained.
- **Research and Analytics:**
When data is repurposed for research, analysis, or innovation, it is anonymised or aggregated wherever possible to prevent identification of individuals.

Safeguards and Accountability

- **Consent and Choice:**
Individuals are given meaningful control over whether their data can be reused or shared beyond the original purpose.
- **Oversight and Audit:**
Any activity involving resale or repurposing of data is subject to internal approval, monitoring, and audit to ensure alignment with compliance requirements and ethical standards.
- **Contractual Controls:**
External parties involved if any, in data use are contractually bound to prevent onward resale or repurposing without explicit authorisation.
- **Grievance Redressal:**
Mechanisms are in place for individuals to raise concerns if they believe their data has been misused, with clear timelines for resolution.

5. Choice

2COMS respects and fully enforces individuals' rights of choice regarding their personal data.

- Opt-In and Opt-Out Options: Individuals are always provided options to opt-in for data collection and processing and to opt-out of non-essential uses, such as marketing communications.
- Informed Consent: Consent is obtained in a clear and understandable manner, ensuring that individuals make informed decisions.
- Withdrawal of Consent: Individuals can withdraw their consent at any time, and 2COMS provides simple mechanisms for doing so.

6. Data Quality

2COMS maintains high standards of data accuracy and relevance.

- Data Accuracy: 2COMS ensures that personal data is accurate, complete, and up-to-date through regular reviews.
- User Responsibility: Individuals are encouraged and supported to promptly notify 2COMS of any changes to their personal data.
- Data Retention: Personal data is retained strictly for as long as necessary for its intended purpose or as required by law.

7. Security and Confidentiality

The security of personal data is safeguarded at the highest level.

- Technical Measures: 2COMS implements encryption, secure servers, and other advanced technical controls to protect personal data.
- Organizational Measures: Access is strictly limited to authorized personnel, and all employees undergo regular training on data protection.
- Incident Response: Established procedures are in place to respond immediately to data breaches, with affected individuals and authorities notified as required.

8. Data Sharing

2COMS ensures that all data sharing is conducted responsibly and transparently.

- Third-Party Sharing: Personal data is shared only with trusted third parties who adhere to equivalent data protection standards.
- Contracts and Agreements: Binding agreements clearly outline third-party responsibilities for personal data handling.
- Transparency in Sharing: Individuals are informed about any third-party sharing through privacy notices.

9. Consent Management

A. Information Collected and Controlled:

2COMS collects only necessary information required to provide services. This includes personal data provided when submitting CVs, creating accounts, registering for events, or making online transactions. Credit card information is never stored except with explicit consent via secure

payment gateways. Candidates engaging with our services provide full consent for data processing required for recruitment and employment formalities.

2COMS also logs basic data such as website navigation, feature usage, and brand interactions on social media. This helps enhance services and develop new offerings. In certain cases, information may be received indirectly through referral partners.

B. Rights of Data Subjects:

Data subjects at 2COMS fully exercise their rights, which include:

- Right to Access, Correction, Erasure, Portability, Restriction of Processing, and Objection to Automated Decision-Making.
- Requests are submitted through our consent management platform or directly, and 2COMS responds within 30 days, unless legally extended.

C. Data Processing Practices:

All data is processed strictly in compliance with applicable laws.

- Personal data is collected for specific, legitimate purposes.
- Data is retained for the minimum required period and securely deleted, anonymized, or isolated thereafter.
- Storage is secured with restricted access; third-party providers maintain strict confidentiality obligations.
- Consent withdrawal is honored immediately, unless lawful grounds for retention exist.

D. Consent Management and Collection:

- Consent is always explicit, clear, and documented.
- Records of consent, scope, and time are maintained.
- Individuals may review and withdraw consent at any time.

E. Data Sharing and Third-Party Disclosures:

- 2COMS does not sell personal data.
- Data is shared only with authorized employees, contractors, and trusted third-party providers under strict confidentiality.

F. Data Retention and Security:

- Personal information is retained only as long as required.
- Data is securely stored, backed up, and accessed only by authorized personnel.

G. Compliance and Updates:

- 2COMS complies fully with data protection laws and regularly reviews privacy practices.
- Significant changes are communicated via email or service announcements.

By continuing to use 2COMS services, individuals operate under this fully enforced Privacy Policy.

10. Openness and Data Access

2COMS guarantees full transparency in data practices and provides individuals with clear, accessible means to understand and exercise control over their personal information.

Access to Data

- **Right of Access:**
Individuals have the right to know what personal data is collected, the purposes for which it is used, and with whom it may be shared.
- **Verification:**
Requests for access are subject to reasonable verification to ensure that data is disclosed only to the rightful individual.
- **Scope of Access:**
On request, individuals can obtain:
 - A summary of the personal data held by 2COMS.
 - The purposes for which it is processed.
 - Categories of recipients with whom the data may be shared.
 - Retention timelines applicable to their data.

Response to Requests

- **Timeliness:**
All access requests are handled within a defined timeframe, with updates provided if additional time is required.
- **Transparency:**
Responses are given in clear and understandable language, avoiding unnecessary complexity or technical jargon.
- **No Unjustified Denial:**
Access is not denied unless there are legitimate grounds, such as safeguarding another individual's rights or complying with lawful restrictions.

Feedback and Continuous Improvement

- **Feedback Mechanism:**
Individuals are encouraged to share feedback on 2COMS's data practices through designated channels.
- **Active Review:**
All feedback and complaints are reviewed regularly to identify areas for improvement in data governance.
- **Policy Updates:**
Suggestions and trends from feedback are incorporated into periodic updates of internal policies, training, and awareness programs.

Accountability Measures

- **Dedicated Contact Point:**
A designated data protection contact or grievance officer is available to respond to access requests and concerns.
- **Record Keeping:**
Logs of all access requests and responses are maintained to ensure accountability and continual improvement.
- **Awareness & Training:**
Employees handling requests receive regular training to ensure fairness, accuracy, and consistency in handling access and openness obligations.

11. International Transfer

2COMS ensures responsible handling of cross-border data transfers.

- Compliance with Regulations: All international transfers strictly comply with applicable data protection laws.
- Safeguards for Transfers: Standard contractual clauses and equivalent safeguards are always implemented.
- Informed Individuals: Individuals are always informed when their data is transferred internationally and about protections applied.

12. Responsibility and Accountability

2COMS maintains full accountability for data protection.

- IT Team Oversight: The IT Team enforces compliance with all data protection practices and regulations.
- Employee Training: All employees are trained on data protection and privacy principles.
- Data Storage: All personal data is stored securely in AWS Cloud with robust security safeguards.
- Ongoing Review: Privacy practices are reviewed and updated regularly to ensure continuous compliance and effectiveness.