

Privacy Notice

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We are Tata Consultancy Services Ltd ('TCS').

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or the Information Commissioner's Office in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

TCS iON Digital Learning Hub is an Online Learning platform offering Courses, Assessments, Communities and Events. It is an ideal platform for an individual who wishes to pursue education on a self-learning pace. It caters to learners across various segments right from K 12 to working professionals. It enables educators and trainers to deliver self-paced and blended learning which enables an individual to learn at any place and any time.

Our Privacy Notice explains:

What information we collect and why we collect it. How we use that information. The choices we offer, including how to access and update information. Your privacy matters to TCS so whether you are new to the Learning Platform or a long time user, please do take the time to get to know our practices – and if you have any questions contact us. While we have tried to keep this document simple, there may be terms you are unfamiliar with. Please read about them before giving your consent.

Information we collect

We collect information to provide better services to all of our users.

We collect information in the following ways:

Information you give us.

For example, our services require you to sign up for a learning module. When you do, we'll ask for personal information, like your name, email address, guardian details if you are a minor, telephone/mobile number to store with your account, your time zone information if you need to see system records as per your own time, your academic and professional information like educational achievements, designation etc., which you can voluntarily provide if you want to use certain features.

Information we collect by automated means.

When you visit our Sites, we may collect certain information by automated means, using technologies such as cookies, web server logs, web beacons and JavaScript. Our Sites are not designed to respond to “do not track” signals received from browsers.

Information we get from your use of our services.

We collect information about the services that you use and how you use them, like the name of the learning module, the duration of the course, interactions with the learning community, the scores/grades that you achieve while completing the course etc.

Device information. We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). The platform may associate your device identifiers or phone number with your Learning account.

Log information.

When you use our services or view content provided by TCS, we automatically collect and store certain information in server logs. This includes details of how you used our service, such as your search queries, Internet protocol address, device event information such as crashes, system activity (for example when you joined a particular community, what posts you created/edited etc., any remarks by Admins on your activities), hardware settings, browser type and browser language, the date and time of your request and referral URL.

Location information.

When you use our services, we may collect and process information about your actual location.

Local storage.

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

Cookies and similar technologies.

Cookies are files that websites send to your computer or another Internet-connected device to uniquely identify your browser or to store information or settings on your device. Our Sites may use cookies such as HTTP cookies. Your browser may tell you how to be notified when you receive certain types of cookies

and how to restrict or disable certain cookies. Please note, however, that without cookies you may not be able to use all the features of our Sites.

Other.

We may use third-party web analytics services on our Sites, which help us analyse how users use the sites. The information collected for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers. We may use third-party plug-ins on our Sites, such as social sharing tools. The providers of these plug-ins may use automated means to collect information regarding your use of the Sites if you choose to interact with the plug-ins. This information (together with any additional information you submit using the plug-ins) is collected directly by the provider of the applicable plug-in and is subject to the privacy policies of that provider. Information we collect when you are signed in to our learning platform, in addition to information we obtain about you from partners, may be associated with your Learning Account. For more information about how you can access, manage or delete information that is associated with your Learning Account, visit the Transparency and choice section of this notice. We may also use your unique identifier (like employee number) only in case some integration is required with your parent organization's legacy systems.

How we use information we collect.

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect TCS and our users. We also use this information to offer you tailored content – like giving you more relevant search results. Public aspects of your learning profile such as name and photo are shared with other users within the social aspects of our platforms. When you contact us, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements. We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. Our automated systems analyse your content (including emails that you send to us) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection. TCS processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can: Review and update your profile. Review and control certain types of information tied to your Account. You may also set your browser to block all cookies, including cookies associated with our services. However, it's important to

remember that many of our services may not function properly if your cookies are disabled. For example, we may not remember your language preferences.

Information you share

Our services let you share information with others. Accessing and updating your personal information Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request. We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others. We provide access to your information and correction of erroneous data to support your rights, as embodied in legislation. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Information we share We do not share personal information with companies, organizations and individuals outside of TCS unless one of the following circumstances applies:

With your consent

We will share personal information with companies, organizations or individuals outside of TCS when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information like your religion, biometric details etc.

With domain administrators

If your Learning Account is managed for you by a domain administrator, then your domain administrator who provides user support to your organization will have access to your Learning Account information (including your email and other data). Your domain administrator may be able to: View statistics regarding your account, change your account password, suspend or terminate your account access, access or retain information stored as part of your account, receive your account information in order to satisfy applicable law, regulation, legal process or enforceable governmental request and restrict your ability to delete or edit information or privacy settings, subject to compliance with applicable law.

For external processing

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Notice and any other appropriate confidentiality and security measures. For example, some of the user contact details (email and mobile number) are shared with the platform payment service provider for financial compliance purposes.

For legal reasons

We will share personal information in terms of access, use, preservation or disclosure of such information to the extent that it is reasonably necessary, with companies, organizations or individuals in good faith. This may be done to: Meet any applicable law, regulation, legal process or enforceable governmental request, enforce applicable Terms of Service, including investigation of potential violations, detect, prevent, or otherwise address fraud, security or technical issues, protect against harm to the rights, property or safety of TCS, our users or the public as required or permitted by law. We may share non-personally identifiable information publicly and with our partners – like publishers or connected sites. For example, we may share information publicly to show trends about the general use of our services. We also would like to state that any “Postings” created by you on the iON Digital Learning Hub Platform (“Postings” include all the content submitted, posted, published or shared in the platform, including but not limited to all posts, notes, questions, comments, videos and file uploads), will conform to all applicable local, state, national and international laws, rules and regulations, including copyright laws, and will also be the property of the community platform. Once you post, you agree in effect to share with “iON Digital Learning Hub” the right to show it elsewhere (like in a Google Search). It's important for any service that deals with user data to have such terms, since “iON Digital Learning Hub” needs a license to be able to show the content that users own, on the site and elsewhere. However, you do keep owning the content, and have the rights to publish it elsewhere (On your personal blog or website, modify it, send it to other people, etc.) If TCS is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy Notice.

Information security

We work hard to protect TCS and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular: We encrypt all of our services using Secure Sockets Layer (SSL). We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems. We reveal only the last four digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing. We restrict access to personal information to TCS employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Children and the Learning Platform

If you are a minor, you may use the Learning platform only with the consent of a parent or guardian.

When this Privacy Notice applies

Our Privacy Notice applies to all of the services offered by TCS and its affiliates but excludes services that have separate privacy policies that do not incorporate this Privacy Notice. Our Privacy Notice does not apply to services offered by other companies or individuals, including products or sites that may be

displayed to you in search results or other sites linked from our services. Our Privacy Notice does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Notice. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes

Our Privacy Notice may change from time to time. We will post any Privacy Notice changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy Notice changes). We will also keep prior versions of this Privacy Notice in an archive for your review.

Retention Policy:

Our data retention policy is governed in compliance to local laws concerning GDPR.

1 - Basic details (120 Years): Student names, the modules and qualifications studied and their outcomes. Records and data which need to be retained while a student might continue to study with the Open University (OU). These will be retained for the 'life of the student' (which is taken to be 120 years from date of registration)

2 - Contact Details, Registration, Fee Transactions (6 Years): There is a legal/contractual requirement to keep records and data relating to fee payment, registration, etc. for six years after the student has completed or withdrawn from the module or programme. There are cases where it is necessary to keep records of student support for 6 years to inform ongoing contact with students. This includes careers support, study issues advice, research student support, and course choice. For example if somebody calls TCS iON Service Desk from their mobile, then the customer support person should be able to find them in the system and support them

3 - Operation Records (3 Years) Data relating to the learner as a user of support services or day to day administration e.g.: Test Centre visit related information, attendance information, where these records are kept on a central electronic system. These will be retained for 3 years.

Transferring your personal data out of the UK

Your personal data will be shared with our head office located in India for the purpose of providing the services to you. Although the UK government has not yet granted adequacy status to India, we are satisfied such sharing complies with UK data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

If you would like further information about data transferred outside the UK, please contact us (details below).

Lawful use of your personal data

Under UK data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract or
- for our legitimate interests or those of a third party (ie when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests).

Your rights

You have the following rights, which you can exercise free of charge:

- Access: The right to be provided with a copy of your personal data
- Rectification: The right to require us to correct any mistakes in your personal data
- Erasure (also known as the right to be forgotten): The right to require us to delete your personal data (in certain situations)
- Restriction of processing: The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data
- Data portability: The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
- The right to object:
 - at any time to your personal data being processed for direct marketing (including profiling);
 - in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.
- Not to be subject to automated individual decision making: The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us (details below) or see the relevant guidance on the Information Commissioner's website: www.ico.org.uk

If you would like to exercise any of those rights, please email, call or write to us (details below), providing enough information to identify yourself and any additional identity information we may reasonably request from you, and letting us know what right you want to exercise and the information to which your request relates.

How to complain

Please contact us if you have any query or concern about our use of your information (details below). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

You can contact us [and/or our Data Protection Officer] by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our Data Protection Officer's contact details

Data Protection Officer for UK and Ireland

DPO.uki@tcs.com