

**Privacy Policy**  
*How We Collect, Use, and Protect Your Information*

**TCC Concept Limited**

CIN: L68200PN1984PLC222140

Effective Date: July, 2026 Version:1.0

## **1. Introduction**

TCC Concept Limited ("TCC Concept", "the Company", "we", "our", or "us") respects your privacy and is committed to protecting the personal data you share with us. This Privacy Policy explains how we collect, use, store, disclose, and protect information in connection with your visit to our website at [www.tccltd.in](http://www.tccltd.in) (the "Website").

This Policy is published in compliance with the Digital Personal Data Protection Act, 2023 ("DPDPA") and the rules thereunder, the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, and all other applicable laws of India.

By accessing or using the Website, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and processing of your personal data as described herein. If you do not agree, please discontinue use of the Website immediately.

## **2. Who We Are — Data Fiduciary**

For the purposes of the DPDPA, TCC Concept Limited acts as the Data Fiduciary in respect of personal data collected through the Website. Our details are:

- Registered Name: TCC Concept Limited
- CIN: L68200PN1984PLC222140
- Registered Office: 5th Floor, VB Capitol Building, Range Hill Road, Opp. Hotel Symphony, Bhoslenagar, Shivajinagar, Pune – 411007, Maharashtra, India
- Contact for Privacy: [compliance@tccltd.in](mailto:compliance@tccltd.in)

## **3. What Information We Collect**

### **3.1 Information You Provide Voluntarily**

We collect personal data that you voluntarily provide to us when you interact with the Website, including:

- Contact information — your full name, email address, telephone number, and organisation name when you submit a contact, partnership inquiry, or investor relations query through the Website;

- Career and employment information — your résumé/CV, employment history, educational qualifications, and contact details if you apply for a position through the Careers section;
- Investor or shareholder communications — queries submitted in connection with investor relations, general meetings, e-voting participation, or shareholder services.

### **3.2 Information Collected Automatically**

When you visit the Website, certain technical and usage information is collected automatically through cookies and similar technologies, including:

- Log data — your IP address, browser type and version, operating system, referring URL, pages visited, time and date of access, and session duration;
- Device information — device identifier, screen resolution, and hardware model;
- Cookie data — identifiers and preferences stored by session, functional, analytics, and preference cookies (see Section 7).

### **3.3 Information from Third Parties**

We may receive information about you from third parties such as stock exchange filings, publicly available shareholder registers, or from your use of third-party authentication or communication tools where you choose to share such information.

## **4. How We Use Your Information**

We process your personal data for the following purposes, relying on the legal bases indicated:

- To respond to your contact or inquiry submitted through the Website — (Legitimate interest / Consent);
- To evaluate your candidacy for employment opportunities at TCC Concept Limited — (Consent / Contractual necessity);
- To provide investor relations services, including disseminating notices of general meetings, annual reports, financial disclosures, and e-voting facilities — (Legal obligation under SEBI LODR / Legitimate interest);
- To maintain, improve, and secure the Website — (Legitimate interest);
- To analyse usage patterns and Website performance using anonymised or aggregated analytics — (Legitimate interest);
- To comply with applicable legal obligations, including disclosures to regulatory authorities such as SEBI, BSE, or NSE — (Legal obligation);
- To prevent fraud, misuse, and unauthorised access to the Website — (Legitimate interest / Legal obligation).

We will not use your personal data for any purpose materially different from those disclosed in this Policy without obtaining your prior consent, except as required by applicable law.

## **5. Disclosure and Sharing of Your Information**

TCC Concept Limited does not sell, rent, or trade your personal data. We may disclose your information in the following circumstances:

## **5.1 Within the TCC Concept Ecosystem**

We may share your information with our portfolio ventures (including Pepperfry, TryThat.ai, Brantford India, MyFlopy, PEPCART, and NES Data) where necessary for the purposes described in Section 4, subject to appropriate data-sharing arrangements.

## **5.2 With Service Providers**

We may engage trusted third-party service providers (Data Processors under the DPDPA) to assist us in operating the Website, hosting infrastructure, data analytics, email communications, and other operational functions. These processors are contractually required to process your data only on our instructions and to implement appropriate security measures.

## **5.3 With Regulatory and Governmental Authorities**

We may disclose your information to SEBI, BSE, NSE, the Ministry of Corporate Affairs, law enforcement agencies, courts, or other governmental authorities where required by applicable law, court order, or regulatory requirement.

## **5.4 Business Transfers**

In the event of a merger, acquisition, restructuring, or sale of assets involving TCC Concept Limited, your personal data may be transferred to the successor entity, subject to the same protections as described in this Policy. We will notify you of any such change in data controller.

## **5.5 With Your Consent**

We may disclose your information to any other third party with your prior consent.

## **6. Data Retention**

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law. The following retention periods generally apply:

- Contact and inquiry data: 3 (three) years from the date of your last interaction with us, unless a longer period is required by law;
- Employment/recruitment data: 1 (one) year from the closure of the application process if your application is unsuccessful; or for the duration of employment plus any applicable statutory post-employment period if successful;
- Investor relations and shareholder communication data: 8 (eight) years from the date of the relevant corporate event or such longer period as required under the Companies Act, 2013, SEBI LODR, or other applicable regulation;
- Cookie and analytics data: as specified in the Cookie Table in Section 7, and in any event no longer than 2 (two) years.

Upon expiry of the applicable retention period, we will securely delete or anonymise your personal data.

## **7. Cookies and Tracking Technologies**

The Website uses cookies and similar technologies to enhance your browsing experience, analyse traffic, and remember your preferences. A cookie is a small data file placed on your device when you visit the Website.

### **7.1 Types of Cookies Used**

- **Strictly Necessary Cookies** — Essential for the Website to function and cannot be switched off. They do not store any personally identifiable information. Retention: session.
- **Functional Cookies** — Enable the Website to remember your preferences (such as language or region). Retention: up to 1 year.
- **Analytics Cookies** — Help us understand how visitors interact with the Website (e.g., Google Analytics). Data is aggregated and anonymised where possible. Retention: up to 2 years.
- **Preference Cookies** — Allow personalisation of the Website based on your prior choices. Retention: up to 1 year.

### **7.2 Managing Cookies**

You may withdraw or manage your cookie consent at any time through your browser settings or through any consent management tool deployed on the Website. Please note that disabling strictly necessary cookies may impact the functionality of certain features.

## **8. Your Rights as a Data Principal**

Under the DPDPA and applicable law, you have the following rights with respect to your personal data:

- **Right to Access** — You may request confirmation of whether we process your personal data and obtain a copy of the data we hold about you;
- **Right to Correction** — You may request that we correct any inaccurate or incomplete personal data we hold about you;
- **Right to Erasure** — You may request deletion of your personal data where it is no longer necessary for the purpose for which it was collected, subject to applicable legal obligations;
- **Right to Withdraw Consent** — Where processing is based on your consent, you may withdraw consent at any time, without affecting the lawfulness of processing prior to withdrawal;
- **Right to Grievance Redressal** — You have the right to have your grievances addressed in a timely and effective manner;
- **Right to Nominate** — You may nominate another individual to exercise your data rights on your behalf in the event of death or incapacity.

To exercise any of the above rights, please submit a written request to our Compliance Officer at [compliance@tccltd.in](mailto:compliance@tccltd.in). We will respond within the period prescribed under applicable law, currently

thirty (30) days, extendable in accordance with the DPDPA. We may require verification of your identity before processing your request.

## **9. Data Security**

TCC Concept Limited implements reasonable administrative, technical, and physical security measures to protect your personal data from unauthorised access, disclosure, alteration, or destruction, consistent with the requirements of the DPDPA and the IT (SPDI) Rules, 2011. These measures include:

- Encryption of data in transit using industry-standard SSL/TLS protocols;
- Access controls and authentication mechanisms to restrict access to personal data to authorised personnel only;
- Regular security assessments and vulnerability testing of our Website infrastructure;
- Contractual security obligations imposed on all third-party Data Processors.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, TCC Concept Limited will notify the Data Protection Board of India and, where required, you as the affected Data Principal, in accordance with the timelines prescribed under the DPDPA.

## **10. Children's Privacy**

The Website is not directed at or intended for use by children under the age of eighteen (18) years. We do not knowingly collect personal data from minors. If we become aware that we have inadvertently collected personal data from a minor, we will take prompt steps to delete such information. Parents or guardians who believe that their child has provided personal data to us should contact us at [compliance@tccltd.in](mailto:compliance@tccltd.in).

## **11. Links to Third-Party Websites**

The Website contains links to third-party websites, including the websites of our ecosystem portfolio companies. TCC Concept Limited is not responsible for the privacy practices of such third-party websites. We encourage you to read the privacy policies of any website you visit before providing any personal information.

## **12. Cross-Border Data Transfers**

Where personal data is transferred outside the territory of India (for example, in connection with cloud-hosting services or group operations), TCC Concept Limited will ensure that such transfers are made in compliance with the DPDPA and any rules or notifications issued thereunder by the Government of India designating countries to which such transfers are permissible. We will implement appropriate contractual or technical safeguards to ensure an equivalent level of data protection.

## **13. Grievance Redressal**

If you have any complaint, concern, or grievance regarding the processing of your personal data or this Privacy Policy, you may contact our designated Grievance Officer:

**Grievance Officer / Compliance Officer**

Ms. Isha Arora, Company Secretary and Compliance Officer  
TCC Concept Limited  
5th Floor, VB Capitol Building, Range Hill Road,  
Opp. Hotel Symphony, Bhoslenagar, Shivajinagar,  
Pune – 411007, Maharashtra, India  
Email: [compliance@tccltd.in](mailto:compliance@tccltd.in)

We will endeavour to address your grievance within thirty (30) days of receipt. If you are not satisfied with our response, you may approach the Data Protection Board of India in accordance with the provisions of the DPDPA.

**14. Changes to This Privacy Policy**

TCC Concept Limited reserves the right to update or revise this Privacy Policy at any time to reflect changes in our practices, technology, legal requirements, or for other operational reasons. The revised Policy will be posted on the Website with an updated effective date. We encourage you to review this Policy periodically. Your continued use of the Website after any revision constitutes your acceptance of the updated Policy. Where required by law, we will seek your fresh consent.

**15. Governing Law**

This Privacy Policy shall be governed by and construed in accordance with the laws of India. Any disputes arising under or in connection with this Policy shall be subject to the exclusive jurisdiction of the courts at Pune, Maharashtra, India.

**16. Contact Us**

For any queries, concerns, or requests relating to this Privacy Policy, please contact:

**TCC Concept Limited**

5th Floor, VB Capitol Building, Range Hill Road,  
Opp. Hotel Symphony, Bhoslenagar, Shivajinagar,  
Pune – 411007, Maharashtra, India  
General Inquiries: [info@tcclimited.in](mailto:info@tcclimited.in)  
Privacy / Compliance: [compliance@tccltd.in](mailto:compliance@tccltd.in)  
Website: [www.tccltd.in](http://www.tccltd.in)