# **Article: Understanding TCS's Privacy Policy Commitment (2025)**

## **Introduction**

Tata Consultancy Services Limited (TCS), a global leader in IT services and consulting, upholds a robust privacy and data protection framework across all its operations, including subsidiaries and foreign branches. TCS’s Privacy Policy Commitment, updated last on July 29, 2025, defines comprehensive principles to ensure lawful, ethical, and transparent handling of personal data, safeguarding the interests of associates, business contacts, customers, vendors, and all individuals interacting with TCS.

## **Scope and Applicability**

The policy is applicable to:

* All TCS entities (direct/indirect subsidiaries, foreign branches)
* All TCS associates, whether full-time or contracted
* Business partners and vendors through contractual compliance requirements

When TCS controls another entity, that entity is also required to align with the privacy principles set out in the policy.

## **Core Privacy Principles**

## **1. Lawfulness of Processing**

TCS collects, stores, processes, uses, shares, transfers, or handles personal data strictly in accordance with legal requirements. Processing is based on legitimate business or compliance purposes or on individual consent, as prescribed by applicable laws and regulations.

## **2. Limiting Collection and Processing**

Personal data processing is always scoped and timed only as necessary for the stated purpose, ensuring data minimization.

## **3. Transparency**

TCS provides clear and accessible information to individuals regarding the scope and purpose of processing their data, including details on how to seek clarifications or exercise rights related to privacy or data protection.

## **4. Accuracy**

TCS implements all measures—legal, technical, and organizational—to ensure accuracy of personal data for the intended purpose. Inaccurate personal data is promptly erased or corrected, and individuals are responsible for informing TCS of any inaccuracies or changes.

## **5. Security and Confidentiality**

To prevent accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access of personal data, TCS employs robust physical, technical, and organizational security controls. The level of protection is commensurate with the risks involved and the nature of the data.

## **6. Privacy by Design**

TCS integrates privacy requirements as a default into its digital systems, technologies, standards, protocols, and manual processes. This approach ensures that privacy is built into every phase of business operations ("Privacy by Design").

## **7. Disclosure**

Personal data is disclosed to third parties only:

* For purposes explicitly identified in the privacy notice
* With the individual’s consent
* When required for lawful purposes (e.g., public authorities, law enforcement agencies)  
   All disclosures are strictly regulated and justified.

## **Rights of Data Subjects (Data Principals)**

TCS supports individuals in exercising their data rights, which—subject to local regulations and the nature of an individual’s engagement—may include:

* Access to personal data held by TCS
* Correction of inaccurate or incomplete personal data
* Objection to processing of personal data
* Right to be forgotten
* Right to withdraw consent
* Right to data portability

Each request is vetted and tracked to closure, in compliance with the law. Individuals can contact their local Data Protection Officer for support (contact details are available on the TCS website).

## **International Data Transfers**

As a global organization, TCS may transfer personal data across national borders—sometimes to countries with less stringent data protection laws. When this occurs, TCS ensures that transferred data is treated in accordance with the principles of its own policy and all applicable legal requirements, providing equivalent protection regardless of location.

## **Data Retention**

TCS follows retention policies to ensure that personal data is stored only as long as required:

* Data is deleted once its intended purpose is fulfilled or no longer necessary
* Exceptions exist where law mandates longer retention or indefinite preservation
* Once legal or business needs end, data is erased as soon as practicable

## **Jurisdiction-Specific Requirements**

Where different national or regional privacy laws apply, TCS supplements this policy with specific procedures and guidelines for compliance. TCS engages with regulators and supervisory authorities as required, implementing country-specific safeguards when necessary.

## **Privacy Organization and Contact**

* The Head—Global Privacy Office oversees privacy compliance and continuous implementation.
* Country- or region-specific data protection officers or equivalent roles may be appointed.
* Individuals can contact the Data Protection Officer for any concerns or rights under the privacy framework.
* Contact details are published in the privacy notice on the TCS website.

## **User Education and Awareness**

TCS conducts regular awareness programs for associates, educating them about potential risks, required controls, and safe handling of personal data. This focus on user education enhances compliance and reduces risk of careless or unintended data handling.

## **Incident Reporting and Data Breach Management**

* All incidents or suspected incidents involving personal data must be reported immediately.
* Reports can originate from TCS associates, clients, third party service providers, or partners.
* TCS investigates all incidents, tracking them to closure.
* When incidents involve illegality, impropriety, or unethical behavior, disciplinary or corrective action is taken in line with TCS policies and the law.

## **Implementation and Governance**

TCS guarantees policy compliance by:

* Continuous communication and reinforcement of its privacy principles
* Regular audits and effective governance systems
* Enabling effective exercise of individual rights
* Remediating concerns raised by individuals or regulators
* Adopting international standards where appropriate to strengthen privacy operations

## **Policy Changes and Versioning**

* This privacy policy is updated periodically to reflect legal or practice changes.
* The latest policy (version 2.4) was updated on July 29, 2025.
* Questions regarding the policy may be addressed to the Head – Global Privacy Office at tcs.cpo@tcs.com.

## **Conclusion**

TCS’s Privacy Policy Commitment upholds international best practices in data protection, ensuring that privacy is treated as a fundamental right throughout the organization. By integrating legal compliance, process transparency, data security, user empowerment, and continuous improvement, TCS demonstrates its dedication to the ethical, lawful, and secure handling of personal data in every business activity worldwide.

1. <https://www.tcs.com/who-we-are/legal/privacy-policy-commitment>