



Troika Tech Services Private Limited

702,B-44, CHINTAMANI SHANTI NAGAR CHS LTD, SECTOR-1,
MIRA ROAD EAST, Mumbai, Maharashtra, 401107 e-Mail id: info@troikatech.net

TROIKA TECH SERVICES – PRIVACY POLICY (INDIA & INTERNATIONAL COMPLIANT)

Effective Date: [1st December, 2025]

This Privacy Policy (“Policy”) describes how Troika Tech Services Private Limited, Troika Management Services Pvt Limited and Troika Plus Private Limited (“Troika Tech”, “we”, “us”, “our”) collects, processes, stores, shares, protects, and uses personal data in connection with the use of our AI communication products, AI Agents, APIs, AI Calling Numbers, workflows, software, applications, and associated services (“Product”).

By accessing or using our Product, the Customer and the Customer’s end-users (“Data Subjects”) agree to the practices described in this Policy.

1. SCOPE OF THIS PRIVACY POLICY

This Policy applies to all:

- Customers using Troika Tech’s AI Agent services
- Authorized Users operating the Product on behalf of the Customer
- End-users who interact with the Customer’s business through Troika Tech’s AI Agents
- Data collected through our website, dashboards, mobile applications, APIs, and integrations

This Policy does **not** apply to third-party tools integrated by Customers, where Troika Tech does not determine processing purposes.

2. CATEGORIES OF DATA WE COLLECT

Depending on how the Product is used, we may collect the following types of personal data:

2.1 Contact and Identification Data

- Name
- Phone number
- Email address
- Business name
- KYC documentation (e.g., address proof, incorporation certificate, GST numbers, cancelled cheques, Tax Statements, Financial Documents)
- Identity verification data (where required by telecom/IT laws)



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2.2 Communication Data

Data generated through AI voice or chat interactions, including:

- Call recordings
- Call transcripts
- Chat transcripts
- Voice samples
- AI-generated summaries
- Campaign metadata (time, duration, telecom operator, location metadata provided by carrier)

2.3 Technical and Usage Data

- Device identifiers
- IP address
- Browser information
- Operating system
- API usage logs
- Interaction patterns
- Workflow triggers and configurations
- AI Agent behavior logs

2.4 Billing and Transaction Data

- Payment confirmations
- Account balance (prepaid usage)
- Invoice records

2.5 Customer-Provided Data

Any data uploaded or integrated by the Customer, including:

- Lead lists
- CRM data
- Contact histories
- Business workflows
- Custom instructions for AI Agents



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2.6 Sensitive Personal Data (Where Applicable)

We do **not** intentionally collect sensitive data unless:

- Requested explicitly by the Customer, AND
 - Required for a lawful purpose AND
 - Provided with clear consent under DPDP Act / GDPR Article 9.
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3. HOW WE USE PERSONAL DATA

Troika Tech processes data for the following lawful purposes:

3.1 Service Delivery

- Routing and enabling AI voice and chat interactions
- Processing AI responses and automations
- Providing communication analytics
- Allocating AI Calling Numbers
- Supporting APIs, integrations, and workflows

3.2 Customer Administration

- Account creation
- Billing, invoicing, and prepaid recharge management
- Fraud prevention
- KYC compliance

3.3 AI Model Functioning

- Generating real-time responses
- Improving message understanding
- Detecting misuse, impersonation, or harmful content
- Preventing telecom and data violations

Note: Troika Tech **does not** use Customer Data to train general-purpose AI models unless explicit written consent is provided.



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3.4 Security and Compliance

- Detecting and preventing unauthorized access
- Complying with TRAI/DoT, law enforcement, or regulatory orders
- Handling disputes regarding spam, DND violations, complaints, or fraudulent use

3.5 Improvement and Diagnostics

- Monitoring system performance
- Developing new features
- Conducting internal quality assessments

4. LEGAL BASIS FOR PROCESSING (GDPR & DPDP COMPLIANT)

We process personal data under the following legal grounds:

4.1 Consent

Where required for:

- Call recordings
- Chat transcripts
- Automated communication
- Data profiling
- International data transfers
- Sensitive personal data

4.2 Contractual Necessity

Processing needed to deliver the Product under the service contract with the Customer.

4.3 Legitimate Interests

- Preventing fraud or misuse
- Monitoring service quality
- Securing our infrastructure
- Improving Product functionality



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4.4 Legal Obligations

Compliance with:

- Indian telecom regulations
- Law enforcement requests
- Tax and accounting rules
- DPDP Act compliance requirements

4.5 Vital/Public Interest

If required under emergency legal orders or national security laws.

5. CUSTOMER RESPONSIBILITY FOR CONSENT

The Customer confirms and warrants that:

- They have obtained **valid, lawful, unambiguous consent** from their end-users for all processing activities performed through the Product.
- They will provide clear notice to end-users regarding call monitoring, AI interactions, and data collection.
- They will maintain records of such consent in accordance with the DPDP Act, GDPR, and CCPA.
- Troika Tech is not responsible for obtaining consent on the Customer's behalf.

Failure to obtain consent makes the Customer solely liable for regulatory or legal consequences.

6. DATA RETENTION

- Communication Data: **Retained for 30 days**, unless extended for lawful purpose or Customer request (if permissible).
- KYC Data: Retained for periods mandated by telecom law.
- Billing and Audit Logs: Retained for statutory audit periods.
- Deleted data may persist in backup archives for limited periods as per security protocols.

Troika Tech retains data only for the duration necessary for the purposes defined in this Policy or as required by law.



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7. DATA SHARING AND TRANSFERS

We may share data only under the following circumstances:

7.1 Service Providers

With vetted processors including:

- Cloud hosting providers
- Payment gateways
- Telecom operators
- Security vendors

7.2 Regulatory Authorities

Where required under:

- Law enforcement orders
- TRAI/DoT mandates
- Court orders
- Data protection authorities

7.3 Internal Teams

Only on a strict need-to-know basis.

7.4 International Transfers

Where data is transferred outside India or outside the EU:

- Adequate safeguards such as SCCs (Standard Contractual Clauses) are applied.
- Transfers comply with DPDP Act rules on cross-border data transfer.

Troika Tech **does not** sell personal data.



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8. DATA SECURITY

Troika Tech implements robust technical and organizational security measures, including:

- Encryption in transit (TLS 1.2+)
- Encryption at rest
- Role-based access control
- Multi-factor authentication
- Audit logs
- Secure access key management
- ISO-aligned security design
- Vulnerability and penetration testing
- Continuous monitoring

Despite strong safeguards, no system is fully immune to risks; the Customer must ensure secure use of credentials and systems.

9. RIGHTS OF DATA SUBJECTS

Depending on jurisdiction, data subjects may exercise:

India – DPDP Rights

- Right to access
- Right to correction
- Right to erasure
- Right to grievance redressal
- Right to withdraw consent
- Right to nominate



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GDPR Rights

- Right to be informed
- Right to access
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making

CCPA/CPRA Rights

- Right to know
- Right to delete
- Right to opt-out of sale or sharing of data
- Right to non-discrimination

Requests may be submitted to:

privacy@troikatech.net

10. DATA PROCESSING ON BEHALF OF CUSTOMERS

Troika Tech acts as:

- A **Data Processor** under GDPR,
- A **Data Fiduciary/Processor** under DPDP Act, and
- A **Service Provider** under CCPA/CPRA

when processing Customer Data on the Customer's instructions.

A separate **Data Processing Agreement (DPA)** may be executed upon request.



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11. AI-SPECIFIC PRIVACY DISCLOSURES

Because the Product uses automated AI systems:

11.1 Transparency

End-users may interact with automated systems without a human present.

11.2 Automated Decision-Making

Troika Tech does **not** take responsibility for:

- Decisions made by Customers based on AI outputs
- AI hallucinations, inaccuracies, or generated statements

11.3 Data Minimization

We avoid storing communication content beyond retention periods unless legally mandated.

12. CHILDREN'S PRIVACY

Troika Tech does not knowingly process data of individuals under **18 years of age** unless explicitly allowed by law and with proper parental consent. Customers are responsible for preventing minors from interacting with AI services where prohibited.

13. GRIEVANCE REDRESSAL

For India (DPDP Act & IT Act compliance):

Grievance Officer: [Godwin Pinto]

Email: info@troikatech.net

Address: [1st Floor, Troika Office, Garden Avenue K, Global City, Virar West, MH-India, 401107]

For EU:

Requests may be addressed to our Data Protection Contact at: godwin@troikaplus.in

14. CHANGES TO THIS PRIVACY POLICY

Troika Tech may update this Policy periodically. Customers will be notified of material changes at least **30 days** before they become effective.

Continued use of the Product constitutes acceptance of updated terms.



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15. CONTACT INFORMATION

For any questions or requests relating to this Policy, please contact:

Email: godwin@troikaplus.in

Corporate Office: 1st Floor, Troika Office, Garden Avenue K, Global City, Virar West, MH-India, 401107

Website: www.troikatech.in