



We Make You A Global Citizen

Digital Personal Data Protection Act (DPDPA) 2023 Policy

1. Introduction

SPRS Consulting India Pvt Ltd T/A GloPass Study Abroad ("GloPass" or "the Company") is committed to protecting the privacy and security of personal data in compliance with the Digital Personal Data Protection Act (DPDPA) 2023. This policy outlines our practices for collecting, processing, storing, and safeguarding personal data.

2. Scope

This policy applies to all personal data processed by GloPass, including data of students, prospective students, employees, partners, website visitors, and any other individuals whose data we handle within India.

3. Definitions

- **Personal Data:** Any data about an individual who is identifiable by or in relation to such data.
- **Data Principal:** The individual to whom the personal data relates.
- **Data Fiduciary:** GloPass, as the entity that determines the purpose and means of processing personal data.
- **Data Processor:** Any person who processes personal data on behalf of the Data Fiduciary.
- **Processing:** Any operation or set of operations performed on personal data, including collection, storage, use, and deletion.
- **DPDPA:** The Digital Personal Data Protection Act 2023.

4. Principles of Data Processing

GloPass adheres to the following principles:

- **Lawful and Fair Processing:** Personal data is processed lawfully and fairly.
- **Purpose Limitation:** Personal data is processed for specified, explicit, and legitimate purposes.
- **Data Minimization:** Personal data processed is limited to what is necessary for the specified purposes.
- **Accuracy:** Personal data is accurate and kept up to date.
- **Storage Limitation:** Personal data is retained only for as long as necessary for the specified purposes.
- **Security:** Personal data is processed in a manner that ensures appropriate security.

5. Lawful Basis for Processing

GloPass processes personal data based on:

- **Consent:** When the Data Principal provides explicit consent.
- **Legitimate Uses:** When processing is necessary for legitimate business purposes, such as providing educational counselling services, fulfilling contractual obligations, or complying with legal requirements.

6. Data Principal Rights

Data Principals have the following rights:

- **Right to Access Information:** To obtain information about their personal data processed by GloPass.
- **Right to Correction and Erasure:** To request correction of inaccurate data or erasure of data that is no longer necessary.
- **Right to Grievance Redressal:** To file a complaint regarding the processing of their personal data.
- **Right to Nominate:** the right to nominate someone to exercise their rights in case of incapacity or death.

7. Data Security Measures

GloPass implements appropriate technical and organizational measures to ensure the security of personal data, including:

- Data encryption.

GloPass- Study Abroad is trading name of SPRS Consulting India Private Ltd & FinAds Consulting Ltd UK

No 22, Bypass Road, Near Jeyasakthi Hotel, Kalavasal, Madurai-625016,

HO: 126, Wheatfield Drive, Bradley Stoke, BS32 9DD, Bristol, United Kingdom

USA:1216, Miccosukee Road, Tallahassee, Florida 32308

T: +91 76677 11335 M: +44 7961 572 520 E: support@glopass.in W: https://.glopass.in

Company registered in India. CIN: U70200TN2025PTC176567 & UK 15570803



We Make You A Global Citizen

- Regular security assessments.
- Access controls.
- Staff training on data protection.
- Incident response procedures.

8. Data Retention

Personal data is retained only for as long as necessary for the purposes for which it was collected, or as required by law. When the retention period expires, data will be securely deleted or anonymized.

9. Data Transfers

If personal data is transferred to third parties or outside India, GloPass ensures that appropriate safeguards are in place, in compliance with the DPDPA.

10. Data Breach Notification

In the event of a data breach, GloPass will notify the Data Protection Board of India and affected Data Principals, as required by the DPDPA.

11. Roles and Responsibilities

- **Data Protection Officer (DPO)/Grievance Officer:** [Insert DPO/Grievance Officer details. If not applicable, designate a person responsible for data protection.]
- **Employees:** All employees are responsible for adhering to this policy and protecting personal data.

12. Policy Review

This policy will be reviewed and updated regularly to ensure compliance with the DPDPA and reflect changes in business practices.

13. Grievance Redressal

Data Principals can file grievances regarding the processing of their personal data by contacting the Grievance Officer at:

- Mr. Thangam Karthick, India +91 76677 11335

14. Contact Information

For questions or concerns regarding this policy, please contact:

- SPRS Consulting India Pvt Ltd T/A GloPass Study Abroad: support@glopass.in

GloPass- Study Abroad is trading name of SPRS Consulting India Private Ltd & FinAds Consulting Ltd UK

No 22, Bypass Road, Near Jeyasakthi Hotel, Kalavasal, Madurai-625016,

HO: 126, Wheatfield Drive, Bradley Stoke, BS32 9DD, Bristol, United Kingdom

USA:1216, Miccosukee Road, Tallahassee, Florida 32308

T: +91 76677 11335 M: +44 7961 572 520 E: support@glopass.in W: <https://.glopass.in>

Company registered in India. CIN: U70200TN2025PTC176567 & UK 15570803