

TECHTRIBE PRIVACY POLICY & DATA PROTECTION NOTICE

Effective Date: September 10, 2026

Document Version: 2.0

Data Fiduciary / Controller: Industrus Tech Business Solutions

Governing Laws: Digital Personal Data Protection (DPDP) Act, 2023 (India), UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 (UK), Regulation (EU) 2016/679 (EU GDPR), and UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection (PDPL).

1. Scope, Entity Identity & Service Nature

This Privacy Policy explains how personal data is collected, used, and protected across TECHTRIBE (techtribe.industrustech.in), which is owned, operated, and controlled by:

- **Legal Entity:** Industrus Tech Business Solutions
- **Registered Office:** Panampilly Nagar, Kochi, Kerala 682036, India
- **Regulatory Role:** Industrus Tech Business Solutions acts as the Data Fiduciary under the Indian DPDP Act, 2023, and as the Data Controller under EU and UK GDPR.

Service Classification & Regulatory Disclaimer:

TECHTRIBE provides career enablement, profile development, ATS CV optimization, and interview coaching. TECHTRIBE is an educational and career advisory platform. It is not an overseas manpower contractor, recruitment intermediary, or immigration consultancy under the Indian Emigration Act, 1983. We do not sponsor visas, issue work permits, or guarantee foreign job placements.

2. Age Eligibility & Protection of Minors

- **Minimum Age Requirement:** You must be at least 18 years of age to access services, engage with mentors, or purchase career acceleration tracks.
- **Minors' Data Prohibition:** In compliance with Section 9 of the DPDP Act (India) and Article 8 of the EU/UK GDPR, we do not knowingly process personal data of, conduct behavioral monitoring of, or target marketing to individuals under 18 years of age.
- Any submitted data identified as belonging to an individual under 18 without verifiable parental consent will be purged immediately.

3. Personal Data We Collect

Category	Specific Elements Collected
A. Identity & Contact Data	Full name, email address, telephone/WhatsApp number, country/city of residence, and contact preferences.
B. Career & Academic Profile	CV/resume data, work experience, past job titles, professional achievements, technical skillsets, university degrees, academic transcripts, and portfolio links.
C. Career Preferences & Target Markets	Preferred international destinations (UK, Ireland, Germany/Europe, UAE/Middle East, or remote), target roles, industry domains, and timeline.
D. Coaching & Evaluation Records	Diagnostic assessment outputs, mock interview recordings/notes, STAR methodology exercises, ATS scoring reports, and application tracking histories.
E. Commercial & Billing Records	Enrolled track tier, invoice references, and payment settlement confirmations. (All credit/debit card transactions are processed securely via PCI-DSS certified gateways; we do not store raw card numbers or CVV codes).
F. Technical & Telemetry Data	IP addresses, browser specifications, access timestamps, referral URLs, and automated security data (including Google reCAPTCHA verification logs).

4. Purposes and Lawful Bases of Processing

Processing Purpose	Data Categories	Lawful Basis (EU / UK GDPR)	Basis Under India DPDP Act

Service Execution: CV rebuilding, LinkedIn profile optimization, career roadmaps, and 1-on-1 interview preparation.	A, B, C, D	Performance of a Contract (Art. 6(1)(b))	Contractual fulfillment agreed to by the Data Principal.
Invoicing & Billing: Processing plan fees, generating GST invoices, and financial auditing.	A, E	Contractual Necessity (Art. 6(1)(b)) & Legal Obligation (Art. 6(1)(c))	Contractual execution and compliance with statutory financial laws.
Recruiter & Opportunity Outreach: Dispatching candidate profiles to prospective employers or external talent desks.	A, B, C	Explicit Consent (Art. 6(1)(a))	Explicit, notified Consent for designated third-party sharing.
Platform Defense & Security: Preventing bot attacks, blocking fraud, and verifying human submissions via reCAPTCHA.	A, F	Legitimate Interests (Art. 6(1)(f)) (system security)	Legitimate operational use for maintaining platform integrity.
Public Success Stories & Case Studies: Publishing candidate milestones, photos, or placement feedback.	A, B, D	Explicit, Freely Given Consent (Art. 6(1)(a))	Explicit, revocable Consent granted under a separate release.
Service Notifications: Delivering schedule alerts, session links, and billing receipts via email or WhatsApp.	A	Performance of a Contract (Art. 6(1)(b))	Necessary operational communications for service delivery.
Marketing Newsletters: Distributing career advice, industry reports, and promotional updates.	A	Consent (Art. 6(1)(a)) (unbundled opt-in)	Specific Consent (with immediate right to revoke).

5. Automated Scoring, AI Systems & Human Oversight

- **Assistive AI Only:** Automated parsing and machine-assisted keyword evaluation tools are used strictly to benchmark documents against industry ATS parameters.
- **No Automated Decisions (GDPR Art. 22):** TECHTRIBE does not make decisions with legal or significant effects based solely on automated processing or AI profiling.
- **Mandatory Human Review:** All profile revisions, career roadmap suggestions, and interview evaluations undergo direct review by qualified human career advisors.

6. Communications & WhatsApp Messaging

- **Voluntary Marketing Opt-In:** Opting in to promotional WhatsApp messages or marketing newsletters is entirely optional and is never a prerequisite for enrolling in career tracks.
- **Revocation:** You may revoke marketing permissions at any time by clicking "Unsubscribe" in emails, replying "STOP" to WhatsApp messages, or emailing grievance@industrustech.in.

7. Cookies & Web Analytics

- **Strictly Necessary Cookies:** Essential for platform navigation, security handshakes, and login sessions. These run automatically.
- **Non-Essential Analytics:** Analytics tracking scripts run only after you have confirmed your preferences via our on-site cookie consent interface.
- **Security Scripts (Google reCAPTCHA):** We implement Google reCAPTCHA to prevent automated bot interactions on contact and checkout forms. This script assesses hardware and software parameters for fraud prevention.

8. Third-Party Disclosures & International Data Transfers

1. **Corporate Ecosystem:** Data may be processed internally within Industrus Tech Business Solutions for IT Service Management (ITSM), platform security, and customer infrastructure.
2. **Contracted Service Processors:** We utilize certified vendors for cloud hosting (e.g., AWS/Google Cloud), payment aggregation, CRM infrastructure, and automated email/WhatsApp distribution under binding Data Processing Agreements (DPAs).
3. **Recruiters & Employers:** Candidate profiles are dispatched to external employers or recruiting agents only upon your express instruction and confirmation for specific roles.
4. **International Transfers:** Data may be processed across international borders (including between India, the UK, the EEA, and the UAE):
 - **EEA/UK to India Transfers:** Executed pursuant to standard contractual clauses (SCCs) and International Data Transfer Agreements (IDTAs).
 - **Transfers Outside India:** Managed strictly in accordance with cross-border transfer rules prescribed under the DPDP Act, 2023.

9. Retention & Permanent Erasure Schedule

- **Enrolled Candidate Files:** Maintained for the program duration plus twenty-four (24) months for alumni reference validation and subsequent career tracking.
- **Unconverted Submissions:** Prospective inquiries, trial submissions, and diagnostic inputs that do not lead to paid enrollment are removed or anonymized after twelve (12) months.

- **Financial Records:** Invoices and payment confirmation logs are retained for seven (7) years to satisfy Indian tax and accounting regulations.
- **Erasure Processing:** Upon receipt of a verified deletion request, files are expunged from active databases within thirty (30) calendar days. *(Note: Data previously transmitted to third-party recruiters at your direction cannot be retrieved or erased by TECHTRIBE from external databases).*

10. Data Subject Rights

Under the DPDP Act, 2023 (India):

- **Right to Access:** Obtain a summary of personal data processed and details of external recipients.
- **Right to Correction & Erasure:** Correct incomplete or outdated records and erase data that is no longer necessary.
- **Right of Grievance Redressal:** Access an internal dispute resolution mechanism.
- **Right to Nominate:** Nominate a representative to exercise rights in the event of death or incapacity.

Under GDPR & UK GDPR (EEA & UK Users):

- **Right of Access (Art. 15):** Request formal confirmation and copies of your personal data.
- **Right to Rectification (Art. 16):** Update or rectify inaccurate personal records.
- **Right to Erasure (Art. 17):** Request permanent erasure where statutory grounds permit.
- **Right to Restrict Processing (Art. 18):** Suspend processing under specific contested conditions.
- **Right to Data Portability (Art. 20):** Obtain your personal data in a structured, machine-readable format.
- **Right to Object (Art. 21):** Object to processing based on legitimate interests or direct marketing.
- **Right to Withdraw Consent (Art. 7(3)):** Revoke previously granted consent at any time.

11. Grievance Redressal & Statutory Contacts

A. Statutory Grievance Redressal Officer (DPDP Act & IT Rules)

Pursuant to Section 8(10) of the DPDP Act, 2023 and Rule 5(6) of the Consumer Protection (E-Commerce) Rules, 2020:

- **Designated Officer:** Sreejith Menon (Lead – Operations & Regulatory Compliance)
- **Corporate Entity:** Industrus Tech Business Solutions
- **Dedicated Email:** grievance@industrustech.in (Copy to: support@industrustech.in)
- **Direct Desk Phone:** +91 9744286868 (Available Monday to Friday, 10:00 AM – 6:00 PM IST)
- **Corporate Address:** Industrus Tech Business Solutions, Panampilly Nagar, Kochi, Kerala 682036, India
- **Response Standards:** Written acknowledgment within forty-eight (48) hours; substantive resolution within thirty (30) calendar days.

B. Cross-Border & Supervisory Escalations

- **India:** Unresolved disputes may be escalated to the Data Protection Board of India (DPBI).
- **United Kingdom:** Inquiries or complaints may be lodged with the Information Commissioner's Office (ICO) at ico.org.uk.

- **European Union:** Inquiries or complaints may be submitted to the local Data Protection Authority in your EU Member State.

12. Amendments & Policy Updates

- Industrus Tech Business Solutions reserves the right to amend, update, or revise this Privacy Policy at any time to reflect changes in our legal obligations, service practices, or regulatory requirements.
- Any updates will be posted on this page with an updated 'Effective Date'. If we make material changes to how we process your personal data, we will notify you through prominent notifications on the platform, via email, or other communication channels before the changes take effect.
- Continued use of our services after the effective date of an updated policy constitutes your acknowledgment and acceptance of the revised terms.

13. UAE Data Protection Notice (PDPL)

In compliance with UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection (PDPL), users and candidates residing in or targeting the United Arab Emirates (UAE) are provided with the following notices:

- **Data Controller:** Industrus Tech Business Solutions acts as the Data Controller for personal data processed across our platform.
- **Your Rights under UAE PDPL:** You have the right to:
 - **Right to Access Information:** Request details about the categories of your personal data processed, the purposes of processing, and any third parties with whom it is shared.
 - **Right to Data Portability:** Request transfer of your personal data to another controller in a structured and machine-readable format.
 - **Right to Rectification or Erasure:** Request the correction of inaccurate data or the permanent deletion of your personal data where it is no longer needed.
 - **Right to Restrict Processing:** Request the restriction of processing in specific circumstances (e.g., if you contest the accuracy of the data).
 - **Right to Stop Processing:** Object to or request the cessation of processing for marketing or profiling purposes.
- **Exercise of Rights:** UAE-based users may exercise their rights by contacting our Grievance Redressal & Compliance Desk at grievance@industrustech.in.

14. Language Accessibility Notice

- In accordance with Section 5(3) of the Digital Personal Data Protection (DPDP) Act, 2023 (India), TechTribe is committed to ensuring that our privacy practices are transparent and accessible to all.
- You have the right to request and access this Privacy Policy, as well as any associated data protection notices or consent requests, in English or in any of the 22 languages specified in the Eighth Schedule to the Constitution of India (including Hindi, Malayalam, Tamil, and others).

To request a translated version of this policy or to submit inquiries in your preferred scheduled language, please contact our Grievance Redressal Officer at grievance@industrustech.in. We will provide the translated documentation within standard statutory timelines.