

Data Privacy Roles and Responsibilities under DPDPA, 2023

About the Digital Personal Data Protection Act, 2023 (DPDPA)

The **Digital Personal Data Protection Act, 2023** is India's primary legislation regulating the processing of personal data in digital form. It applies to all entities that collect or handle personal data within India, including service-based businesses and technology platforms.

The Act classifies two main roles:

- **Data Fiduciaries** – Entities that determine the purpose and means of processing personal data (e.g., Service Points).
- **Data Processors** – Entities that process data on behalf of Data Fiduciaries (e.g., Boson Info Tech Pvt Ltd, through its ACMS platform).

The DPDPA emphasizes:

- **Lawful and transparent data processing**
- **Consent-based data collection**
- **Purpose and storage limitations**
- **Data minimization and accuracy**
- **Accountability of Data Fiduciaries**
- **Security safeguards and breach notifications**
- **Individual rights:** access, correction, erasure, and grievance redressal

All businesses handling customer information must align their practices with these principles to ensure compliance and protect user privacy.

Responsibilities of Boson Info Tech Pvt Ltd (as Data Processor / SaaS Provider)

Boson Info Tech Pvt Ltd, as the developer and provider of the ACMS (Akshaya Centre Management System) platform, acts as a **Data Processor** under the Digital Personal Data Protection Act, 2023. The company provides the technical infrastructure used by Service Points (Data Fiduciaries) to collect, store, and manage personal data such as names, mobile numbers, and other customer-specific information.

As a Data Processor, Boson Info Tech is responsible for:

1. **Data Security and Protection**
Ensuring that the ACMS platform is secure and follows industry standards for encryption, data transmission, and storage to protect personal data from unauthorized access, breaches, and misuse.
2. **Data Minimization and Limitation**
Only storing or processing the data that is necessary for the functioning of the ACMS platform and not using or disclosing personal data for any purpose other than that specified by the Service Points (Data Fiduciaries).
3. **System Compliance and Updates**
Maintaining the ACMS platform in compliance with relevant provisions of the DPDP Act, 2023. This includes timely system updates, vulnerability patches, and improvements in privacy-enhancing technologies.

4. **Access Control**

Ensuring that access to customer data is restricted only to authorized Service Points and their verified users, through secure authentication and session management practices.

5. **Incident Response and Support**

Informing the concerned Service Point in case of any data security incident or breach and assisting in investigations or notifications, as per legal requirements.

6. **Transparency and Logging**

Providing logs and reports for audit purposes, where required by law or contract, without compromising the privacy of customer data.

7. **No Direct Processing**

Boson Info Tech does not independently collect or directly process personal data for its own purposes. It does not sell, share, or analyze customer data unless explicitly instructed by the respective Service Points.

8. **Grievance Support Channel**

Maintaining a designated contact for addressing any queries or complaints related to the data processing role of Boson Info Tech in accordance with the legal obligations.

By fulfilling these responsibilities, Boson Info Tech ensures that its SaaS platform remains a reliable and compliant tool for service points to manage customer data responsibly.

Responsibilities of Service Points (Data Fiduciaries / Clients)

Under the Digital Personal Data Protection Act, 2023 (DPDPA), **Service Points** using the ACMS platform are considered **Data Fiduciaries**, meaning they are the entities that determine the purpose and means of processing customer personal data.

As Data Fiduciaries, Service Points have the following responsibilities:

1. **Lawful Collection and Consent**

Service Points must ensure that personal data such as customer name, mobile number, and any other identifiable information is collected **lawfully and fairly**, with the customer's informed **consent**. They must clearly communicate the purpose of data collection at the time of entry.

2. **Purpose Limitation**

Customer data must be used **only for the specific services** for which it was collected (e.g., service appointments, queue management, communication). Any other usage requires additional, explicit consent from the customer.

3. **Data Accuracy and Minimization**

Service Points are responsible for collecting **only the minimum necessary information** and ensuring that the data they collect is **accurate and up to date**.

4. **Customer Rights and Redressal**

Service Points must honor customers' rights under the DPDPA, such as the right to access, correct, delete, or withdraw consent for their personal data. A clear channel for grievances or data-related requests must be available.



5. **Data Security**

Service Points must ensure that **unauthorized persons do not access** customer data. They must follow best practices in handling devices, passwords, and user access to prevent data leakage or misuse.

6. **No Unauthorised Sharing**

Service Points are prohibited from selling, sharing, or transferring customer data to third parties without legal justification or customer consent.

7. **Training and Awareness**

Staff and operators at Service Points must be made **aware of their data responsibilities**, including how to collect data appropriately and how to respond to customer queries about data privacy.

8. **Breach Notification and Cooperation**

In case of any suspected or confirmed data breach, Service Points must inform Boson Info Tech Pvt Ltd immediately and cooperate with investigations, customer communication, or legal procedures as necessary.

9. **Retention and Deletion**

Service Points must ensure that personal data is **not retained longer than necessary**, and that deletion or anonymization is carried out in a timely manner based on operational needs or customer requests.

10. **Strict Policy on Customer data**

Aadhaar or any other sensitive personal information must not be saved, uploaded, or shared within the ACMS software platform under any circumstances. This is strictly prohibited to ensure compliance with privacy regulations and to protect customer data..

By fulfilling these obligations, Service Points help uphold the privacy and trust of their customers and maintain compliance with national data protection laws.

Grievance Redressal Contact

For any concerns regarding data privacy, usage, or security related to the services of Boson Info Tech Pvt. Ltd. or its service points, please contact:

Grievance Officer : Mr. Shaji Alex
Designation : Director, Boson Info Tech Pvt. Ltd.
Email : shajialex@bosoninfotech.com
Response Time : Within 7 working days

Signature & Confirmation

This document serves as a guideline to ensure data privacy compliance across all users of the ACMS platform.

Authorized Signatory:

Name : Shaji Alex
Designation : Director
Date : 31-07-2025
Location : Angadikadavu

Signature: (Digitally signed)

This document is digitally signed and does not require a physical signature.