

# S M A M & Co

## Chartered Accountants

Data Security Council of India  
3rd, Floor, NASSCOM Campus,  
Plot No-7-10, Sector-126,  
Noida-201303, Uttar Pradesh

Independent Auditor's Statement to Certificate dated 11 December 2024, pursuant to the requirements of Rule 17(5) of the Foreign Contribution (Regulation) Rules, 2011 (as amended) on the foreign contributions received for the year ended on 31 March 2024.

1. We have been requested by the Data Security Council of India (the 'Company') having its corporate office at the above-mentioned address, Darpan ID.: DL/2018/0187853 and Registration no. under the FCRA 231661286, to certify the transactions and the balances of foreign contribution received by the Company, maintenance of records relating to Foreign Contribution (Regulation) Act, 2010 ('Act') read with rule 17 of the Foreign Contribution (Regulation) Rules, 2011 (as amended) ('Rules') for the purpose of onward submission to the Secretary, the Government of India, Ministry of Home Affairs, New Delhi. Accordingly, this certificate is issued in accordance with the terms of our engagement letter dated 1 October 2024.
2. We have audited the accompanying special purpose financial statements of the Company which comprise the Balance Sheet as at 31 March 2024, the Income and Expenditure Statement and Receipts and Payment Account for the year ended 31 March 2024, and significant accounting policies and notes to the financial statements (hereinafter together referred to as 'Foreign Contribution Financial Statements') with respect to Foreign Contribution and accompanying Annexure A in accordance with the basis of accounting to the Foreign Contribution Financial Statements, prepared by the management of the Company pursuant to the requirement of section 19 of the Foreign Contribution (Regulation) Act, 2010 ('Act') read with rule 17 of the Foreign Contribution (Regulation) Rules, 2011 (as amended) ('Rules'). The accompanying Annexure have been initialled by us for identification purpose only.

### Management's Responsibility for the Foreign Contribution Financial Statements and Annexure

3. The Management is responsible for preparation and presentation of the Foreign Contribution Financial Statements and Annexure in accordance with the basis of accounting including preparation and maintenance of all accounting and other relevant supporting records and documents. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the Foreign Contribution Financial Statements and Annexure and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.
4. The Management is also responsible for ensuring that the Company complies with the requirements of the Act read with relevant Rules and providing all required information to the Ministry of Home Affairs.

### Auditor's Responsibility

5. Pursuant to the requirement as stated in paragraph 2 above, it is our responsibility to provide a reasonable assurance in form of an opinion on these Foreign Contribution Financial Statements and Annexure based on our audit. Our audit of these Foreign Contribution Financial Statements was conducted in accordance financial statements in accordance with the Standards on Auditing and other applicable authoritative pronouncements issued by the Institute of Chartered Accountants of India ('ICAI'). Those Standards require that we comply with



Ground Floor, A-130, A Block, Sector 63, Noida  
Uttar Pradesh- 201301  
PAN: AECFS9549G  
GSTIN: C9AECFS9549G1Z1

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ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the Foreign Contribution Financial Statements and Annexure are free from material misstatement due to fraud or error.

6. We have examined the following documents furnished by the Company
  - a) Foreign Contribution Financial statements comprising Balance Sheet as at 31 March 2024, the Income and Expenditure Account, and the Receipts and Payments Account for the year ended, and a summary of significant accounting policies and other explanatory information.
  - b) Books and records relating to Foreign Contributions received and utilized;
  - c) Copy of the Bank statement of FCRA accounts designated for receiving foreign contribution ("the Designated Account") held by the Company and utilization accounts,
  - d) Extract of relevant ledger Accounts and supporting vouchers
  - e) Copy of permission obtained under the Foreign Contribution (Regulation) Act, 2010 and
  - f) Written representation by the management.
7. We conducted our examination in accordance with the Guidance Note on Reports Certificates for Special Purposes issued by the ICAI. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the ICAI.
8. We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control of Firms that Performs Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagement Issued by the ICAI.

Restriction on distribution or use

9. The Certificate is issued solely in the context of the Company's obligation to comply with the requirements of Rule 17(5) of the Rules, which requires them to submit Form FC-4 for the year ended 31 March 2024 to the Secretary, Government of India, Ministry of Home Affairs, New Delhi. This certificate should not be used by any other person or for any other purpose to whom this certificate is shown or into whose hands it may come without our prior written consent. S M A M & Co shall not be liable to the Company, Directors, Ministry of Home Affairs or to any other concerned for any claims, liabilities or expenses relating to this assignment, except to the extent of fee relating to this assignment.

For and on behalf of:

S M A M & Co

Chartered Accountants

Firm's registration No. 028845C

Hemant Mishra  
Partner

M.No.: 508008

UDIN: 24508008BKFM BY7532

Place: Noida

Date: 11-12-2024



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## Chartered Accountants

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Data Security Council of India 3rd,  
Floor, NASSCOM Campus, Plot  
No-7-10, Sector-126,  
Noida-201303, Uttar Pradesh

1. We have audited the attached Balance Sheet as at 31 March 2024, statement of Income and Expenditure and statement of Receipts and Payments for the year ended on that date, and a summary of significant accounting policies and other explanatory information annexed thereto of Data Security Council of India ("the Company") having FCRA Registration No. 231661286, Darpan ID.: DL/2018/0187853, PAN: AACCD9781G, in so far as those pertain to "Foreign Contribution Regulation Account (FCRA), Accounts prepared by the Company with the books and records of the Company as produced to us for our examination. Preparation of financial statements in accordance with the Foreign Contribution (Regulation) Act, 2010 ('the Act') read with the rules, is the responsibility of the Company. Our responsibility is to verify these financial statements in accordance with the said Act.
2. Our examination was carried out in accordance with the auditing standards, generally accepted in India and the Guidance note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India (ICAI).
3. Based on our examination as mentioned in paragraph 2 above and as per the information and explanation given to us, we certify that;
  - i. The cash and bank balance at the beginning of the financial year 2023-2024 (as of 1 April 2023) amounts to INR 16,54,638.
  - ii. No foreign contributions were received during FY 2023-2024.
  - iii. Interest income received by the Company during FY 2023-2024 amounts to INR 19,714.
  - iv. The cash and bank balance as of 31 March 2024, stands at INR 6,59,082.
  - v. No administrative expenses were incurred during the year.
  - vi. Certified that the Company has maintained the accounts of foreign contribution and records relating thereto in the manner specified in section 19 of the Foreign Contribution (Regulation) Act, 2010 (42 of 2010) read with rule 17 of the Foreign Contribution (Regulation) Rules, 2011.
  - vii. The information in this certificate and in the enclosed Balance Sheet and statement of Receipt and Payment and Income and Expenditure Account is correct to the best of our knowledge and belief.
  - viii. The Company has utilized the foreign contribution received for the purpose(s) it is registered under Foreign Contribution (Regulation) Act, 2010.



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# S M A M & Co.

This certificate has been issued at the request of the Company to whom it is addressed solely in the context of its obligation to submit Form FC-4 for the year ended 31 March 2024 to the Ministry of Home Affairs of India and should not be used by any other person or for any other purpose, without obtaining our prior written permission.

To be read along with our other statement of even date.

For and on behalf of:

S M A M & Co

Chartered Accountants

Firm's registration No. 028845C



Hemant Mishra

Partner

M. No: 508008

UDIN: 24508008BKFMBY7532



Place: Noida Date:

11-12-2024

**Data Security Council of India****Balance Sheet as at 31 March 2024 - (Foreign Contribution)***(All amounts in Indian Rupees, unless otherwise stated)*

| Particulars                                     | Note | As at 31 March, 2024 | As at 31 March, 2023 |
|-------------------------------------------------|------|----------------------|----------------------|
| <b>SOURCES OF FUNDS</b>                         |      |                      |                      |
| Project Fund                                    | 3    | 603,680              | 810,907              |
| <b>TOTAL</b>                                    |      | <b>603,680</b>       | <b>810,907</b>       |
| <b>APPLICATION OF FUNDS</b>                     |      |                      |                      |
| <b>Current Assets, Loans and Advances</b>       |      |                      |                      |
| Loans and Advances                              | 4    | -                    | 15,850               |
| Cash and Bank Balances                          | 5    | 659,082              | 1,654,638            |
|                                                 |      | <b>659,082</b>       | <b>1,670,488</b>     |
| <b>Less: Current Liabilities and Provisions</b> |      |                      |                      |
| Current Liabilities                             | 6    | 55,402               | 859,581              |
|                                                 |      | <b>55,402</b>        | <b>859,581</b>       |
| <b>Net Current Assets</b>                       |      | <b>603,680</b>       | <b>810,907</b>       |
| <b>TOTAL</b>                                    |      | <b>603,680</b>       | <b>810,907</b>       |
| Summary of significant accounting policies      | 2    |                      |                      |

The accompanying notes form an integral part of these financial statements

This is the balance sheet referred to in our report of even date

**For S M A M & Co**

Chartered Accountants

Firm's registration No:028845C

Hemant Mishra

Partner

Membership No. 508008

UDIN: 24508008BKFM BY7532

Place: Noida

Date: 11-12-2024



For Data Security Council of India

Authorised Signatory

Place: Noida

Date: 11-12-2024

for DATA SECURITY COUNCIL OF INDIA

Authorised Signatory

**Data Security Council of India****Income and Expenditure Account for the year 01 April, 2023 to 31 March, 2024 - (Foreign Contribution)***(All amounts in Indian Rupees, unless otherwise stated)*

| Particulars                                                                                     | Note | For the year ended<br>31 March 2024 | For the year ended 31<br>March 2023 |
|-------------------------------------------------------------------------------------------------|------|-------------------------------------|-------------------------------------|
| <b>INCOME</b>                                                                                   |      |                                     |                                     |
| Project Grant                                                                                   | 8    | 87,876                              | 8,161,490                           |
| Interest Income                                                                                 | 9    | 19,714                              | 168,581                             |
|                                                                                                 |      | <b>107,590</b>                      | <b>8,330,071</b>                    |
| <b>EXPENDITURE</b>                                                                              |      |                                     |                                     |
| Programme Expenses                                                                              | 10   | 226,941                             | 7,425,664                           |
| Administrative Expenses                                                                         | 11   | -                                   | 737,365                             |
|                                                                                                 |      | <b>226,941</b>                      | <b>8,163,029</b>                    |
| <b>Excess/ (deficit) of income over expenditure for the year</b>                                |      | <b>(119,351)</b>                    | <b>167,042</b>                      |
| <b>Excess/(deficit) of income over expenditure for the year<br/>transferred to Project fund</b> |      | <b>(119,351)</b>                    | <b>167,042</b>                      |

Summary of significant accounting policies

2

The accompanying notes form an integral part of these financial statements

This is the Income and Expenditure referred to in our report of even date

**For S M A M & Co**

Chartered Accountants

Firm's registration No:028845C

Hemant Mishra

Partner

Membership No. 508008

UDIN: 24508008BKFMBY7532

**for DATA SECURITY COUNCIL OF INDIA****Authorised Signatory**

Authorised Signatory

Place: Noida

Date: 11-12-2024

Place: Noida

Date: 11-12-2024

**for DATA SECURITY COUNCIL OF INDIA**  
**Authorised Signatory**

**Data Security Council of India**

**Receipts and Payments account for the year 01 April, 2023 to 31 March, 2024 - Foreign Contribution**

(All amounts in Indian Rupees, unless otherwise stated)

| 2022-23          | Receipts                         | 2023-24          | 2022-23          | Payments                             | 2023-24          |
|------------------|----------------------------------|------------------|------------------|--------------------------------------|------------------|
| 8,816,535        | <b>Opening Balance b/f</b>       | 1,654,638        |                  | <b>Information and Data Security</b> |                  |
|                  | <b>Project Grant</b>             |                  | 3,731,111        | <b>/Privacy Projects</b>             | 114,840          |
|                  | - Sectoral Privacy Guide Project |                  | 2,833,019        | - Sectoral Privacy Guide Project     | 40,849           |
|                  | - Solidarity Grant               |                  |                  | - Solidarity Grant                   |                  |
| 168,581          | Interest Income                  | 19,714           | 737,365          | Administrative Expenses              | -                |
|                  |                                  |                  | 15,850           | Loan and advances                    | -                |
|                  |                                  |                  | 13,133           | Liabilities paid                     | 859,581          |
|                  |                                  |                  | 1,654,638        | <b>Closing Balance c/f</b>           | 659,082          |
|                  |                                  |                  |                  | Cash at Bank                         |                  |
| <b>8,985,116</b> | <b>Total</b>                     | <b>1,674,352</b> | <b>8,985,116</b> | <b>Total</b>                         | <b>1,674,352</b> |

**For S M A M & Co**

Chartered Accountants

Firm's registration No:028845C

  
Hemant Mishra  
Partner

Membership No. 508008  
UDIN: 24508008BKFBY7532



for DATA SECURITY COUNCIL OF INDIA

  
Authorised Signatory

Place: Noida

Date: 11-12-2024

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Date: 11-12-2024

for DATA SECURITY COUNCIL OF INDIA

  
Authorised Signatory

**Notes to accounts to extracted financial statements – (foreign payments)**

**1. Nature of operations and corporate information**

- a) Data Security Council of India (the 'Company') was established on 22 August 2008 under the provisions of Section 25 of the erstwhile Companies Act, 1956 (replaced with Section 8 of the Companies Act, 2013 (the 'Act'), with effect from April 2014). The Company is limited by way of guarantee and was promoted by the National Association of Software and Services Companies (NASSCOM). The Company is engaged in promoting, encouraging, supporting data protection and information security, maintenance of data privacy in India, carrying out research, dissemination of information, setting up standards for the members and providing education, training, conducting meetings, seminars, workshops, conferences, interacting with government or non-government bodies, agencies, companies or any other person.
- b) The Company is a not-for-profit company incorporated and domiciled in India, with its registered office situated at Plot no. 8, 3rd Floor, E Block, Balajee Estate, Guru Ravidas Marg, Kalkaji, South Delhi, New Delhi, Delhi, Delhi- 110019

**2. Statement of significant accounting policies**

**a) Basis of Accounting**

The extracted accounts of the Company are prepared under the historical cost convention and in accordance with the applicable accounting standards.

**b) Use of estimates**

The preparation of extracted financial statements in conformity with generally accepted accounting principles requires management of the Company to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent liabilities at the date of the financial statements and the results of operations during the reporting period end. Although these estimates are based upon management's best knowledge of current events and actions, actual results could differ from these estimates.

**c) Grants**

Grants and subsidies from government/ other bodies are recognized when there is reasonable assurance that the grant will be received, and all attaching conditions will be complied with.

When the grant relates to an expense item, it is recognized as income over the periods necessary to match them on a systematic basis to the costs, which it is intended to compensate. Where the grant or subsidy relates to an asset, its value is deducted in arriving at the carrying amount of the related asset.

Grant funds subject to conditions set out by the contributor and agreed to by Company when accepting the contribution are designated and disclosed as restricted grants under sources of funds in the balance sheet.

**d) Revenue recognition**

Revenue is recognized to the extent that it is probable that the economic benefits will flow to the Trust and the revenue can be reliably measured.

Revenue from unrestricted grants is recognized based on collections from various grantors/donors.

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(All amounts in rupees, unless otherwise stated)

Revenue from restricted / specific donations are recognized over the periods necessary to match them on a systematic basis to the costs, which it is intended to compensate. Any amount not utilized is classified as Liabilities.

As per our report of the even date

For **S M A M & CO**

Chartered Accountants

Firm's registration No: 028845C



Hemant Mishra  
Partner

Membership No.508008

UDIN: 24508008BKFM BY7532



For **Data Security Council India**



Authorized Signatory

Place: Noida

Date: 11-12-2024

for **DATA SECURITY COUNCIL OF INDIA**

  
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Data Security Council of India  
Schedule forming part of Financial Statements- (Foreign Contribution)

|                                                            |                                   | Amount in INR           |                         |
|------------------------------------------------------------|-----------------------------------|-------------------------|-------------------------|
| Note-3 : Project Fund                                      |                                   | As at<br>31 March, 2024 | As at<br>31 March, 2023 |
| Surplus of I&E account                                     |                                   |                         |                         |
| Opening Balance                                            |                                   | 723,031                 | 555,989                 |
| Add: Balance transferred from Income & Expenditure Account |                                   | (119,351)               | 167,042                 |
|                                                            |                                   | 603,680                 | 723,031                 |
| Unspent grants                                             |                                   |                         |                         |
|                                                            | Sectoral Privacy<br>Guide Project |                         |                         |
| Opening balance of Unspent Grant                           | 72,026                            | 15,850                  | 87,876                  |
| Add : Unspent grant received during the year               | -                                 | -                       | -                       |
|                                                            | 72,026                            | 15,850                  | 87,876                  |
| Less : Amount transferred to I& E account                  | 72,026                            | 15,850                  | 87,876                  |
|                                                            | -                                 | -                       | 87,876                  |
| Total Unspent Project Fund                                 |                                   | 603,680                 | 810,907                 |

| Note-4 : Loans & Advances |  | As at<br>31 March, 2024 | As at<br>31 March, 2023 |
|---------------------------|--|-------------------------|-------------------------|
| Pre- paid Expenses        |  | -                       | 15,850                  |
|                           |  | -                       | 15,850                  |

| Note-5 : Cash & Bank balances |  | As at<br>31 March, 2024 | As at<br>31 March, 2023 |
|-------------------------------|--|-------------------------|-------------------------|
| Cash at Bank                  |  | 659,082                 | 1,654,638               |
|                               |  | 659,082                 | 1,654,638               |

| Note-6 : Current Liabilities |  | As at<br>31 March, 2024 | As at<br>31 March, 2023 |
|------------------------------|--|-------------------------|-------------------------|
| Sundry Creditors             |  | 55,402                  | 790,741                 |
| TDS Payable                  |  | -                       | 68,840                  |
|                              |  | 55,402                  | 859,581                 |

Data Security Council of India  
Schedule forming part of Financial Statements- Foreign Contribution

| Note-8 : Project Grants                          |  | For the year ended<br>31 March, 2024 | For the year ended<br>31 March, 2023 |
|--------------------------------------------------|--|--------------------------------------|--------------------------------------|
| Omidyar Network - Sectoral Privacy Guide Project |  | 72,026                               | 4,954,955                            |
| Omidyar Network - Solidarity Grant               |  | 15,850                               | 3,206,535                            |
|                                                  |  | 87,876                               | 8,161,490                            |

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| Note-9 : Interest Income        | For the year ended<br>31 March, 2024 | For the year ended<br>31 March, 2023 |
|---------------------------------|--------------------------------------|--------------------------------------|
| Interest on Saving Bank Account | 19,714                               | 168,581                              |
| Interest on Fixed deposit       | -                                    | -                                    |
|                                 | <b>19,714</b>                        | <b>168,581</b>                       |

| Note-10: Programme Expenses (Information and Data Security/<br>Privacy) | Sectoral Privacy<br>Guide Project | Solidarity Grant | For the year ended<br>31 March, 2024 | For the year ended<br>31 March, 2023 |
|-------------------------------------------------------------------------|-----------------------------------|------------------|--------------------------------------|--------------------------------------|
| Computer Consumable                                                     | -                                 | 24,999           | 24,999                               | -                                    |
| Insurance Expense                                                       | -                                 | 15,850           | 15,850                               | -                                    |
| Salary to Technical Analyst                                             | -                                 | -                | -                                    | 782,918                              |
| Privacy Guide Content development fee                                   | -                                 | -                | -                                    | 2,502,000                            |
| Privacy Guide Designing Expenses                                        | 142,190                           | -                | 142,190                              | 2,218,164                            |
| Privacy Challenge Activity Expenses                                     | -                                 | -                | -                                    | 1,600,720                            |
| Travel, lodging and boarding expenses                                   | 38,592                            | -                | 38,592                               | 212,936                              |
| Printing of Healthcare book                                             | 5,310                             | -                | 5,310                                | 106,099                              |
| Communication Expenses                                                  | -                                 | -                | -                                    | 2,827                                |
|                                                                         | <b>186,092</b>                    | <b>40,849</b>    | <b>226,941</b>                       | <b>7,425,664</b>                     |

| Note- 11: Administrative Expenses<br>(Information and Data Security/ Privacy) | Sectoral Privacy<br>Guide Project | Solidarity Grant | For the year ended<br>31 March, 2024 | For the year ended<br>31 March, 2023 |
|-------------------------------------------------------------------------------|-----------------------------------|------------------|--------------------------------------|--------------------------------------|
| Staff Salaries and Benefits                                                   | -                                 | -                | -                                    | 337,457                              |
| Legal and Professional charges                                                | -                                 | -                | -                                    | 396,735                              |
| Bank Charges                                                                  | -                                 | -                | -                                    | 1,815                                |
| Travelling Expenses                                                           | -                                 | -                | -                                    | 1,358                                |
| <b>Total</b>                                                                  | <b>-</b>                          | <b>-</b>         | <b>-</b>                             | <b>737,365</b>                       |

Note-12 : Previous year's figures have been regrouped / reclassified wherever necessary to correspond with the current year's classification / disclosure.

for DATA SECURITY COUNCIL OF INDIA

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