

DATA POLICY

INTRODUCTION

ELCARREIRA TECHNOLOGIES PVT LTD – (Social.HR). (the “Company”, “We”, “Our”, “Us”) offers talent and career management platform and services (“Services”) to enterprise users (“Enterprise Users”) and individuals users (“Individual Users”) (collectively, Enterprise Users and Individual Users referred to as “Users”). This Data Policy describes the Users’ data We collect, store, use and disclose, and the ways in which the Users’ data and privacy is protected. By using Our Services, Users agree to the terms and conditions of this Data Policy.

TYPES AND MODES OF USER DATA COLLECTION

Data provided by Users:

We collect personal identification (such as name, email address, mobile number, physical address/ location, gender, links to external profiles, photos, etc.), career profile (education, certifications, work experience, skills and competencies, roles & projects handled, salary, areas of interest, etc.) and other information of Individual Users.

We collect enterprise identification (name, registration number, address/ location, website, email address, directors and officers, etc.), enterprise structure (organization roles, reporting structure, skills and competencies, goals and objectives, etc.), learning content (courses, materials, assessments, etc.), employee information (name, email address, mobile number, physical address/ location, gender, links to external profiles, photos, roles, managers, salary/ compensation, goals, teams/ peer groups, etc.) and other information of Enterprise Users.

Services may only be available upon providing mandatory and necessary information as indicated while using the Services. Users may choose to provide the other / optional information which can be used by Us to provide enhanced and more personalized experience of Services.

If Users submit any personal data of other people to use the Services, such Users represent that they have the right to do so and to permit Us to use such information in accordance with this Data Policy.

Data generated by using Our Services:

We collect information about sections, pages, features, functionality of Services accessed, and actions taken by Users. We collect information on any enterprises, groups, or individuals that Users are connected to while using the Services, the interaction/ communication/ workflow between Users. We also collect information on purchases or subscriptions made while using our Services, including any offline interactions with our support center, as well as any participation in any third party/ partner initiative. We may also collect information from and about the Users computers, phones and connected devices used to access the Services or in combination of the Services.

Modes of user data collection:

We collect data directly from Users while signing-up to or using Our Services, including any offline interactions with our support center or partners. We may also collect User data from other sources, such as public databases, joint marketing partners, social media platforms and other third parties.

USAGE OF DATA

For Services:

We use data collected to provide access and basic functionality of Our Services to Users, including offline services through support center or partners. We also analyze data and information to personalize features and content, improve experience and make suggestions. We use user data to contact the Users and send relevant communication including newsletters, campaigns, changes to Services or usage policies,

For maintenance, security, and improvements:

We use data collected to maintain, operate, and keep up to date the software and infrastructure, and to support user devices. We also analyze user data to protect and secure Our Services. We use and analyze data, including in combination with other data we may have sourced, for market research, usage trends, user experience/ satisfaction, and to enhance and improve Our Services.

For promotions:

We analyze and use data, including in combination with other data we may have sourced, for Our business purposes, including advertising and promotional campaigns, determining the effectiveness of the promotional campaigns, customizing and personalizing advertisements on our Services, websites, third-party websites, social media sites, and offline modes.

For other business services:

We use, process, and analyze data, including in combination with other data we may have sourced, to provide analytics, research reports and consulting services.

DISCLOSURE OF DATA

To Services and internal teams:

We provide access to Our Services, including access to systems with personal data where necessary, to our staff and service provider personnel, involved in operating, supporting, maintaining or improving the Service. Data will also be shared with marketing team for advertising and promotional campaigns. Aggregate data and non-personally-identifiable may be used to provide business services to third parties including analytics, research reports and consulting services.

To personal data owners:

Personal data of employees uploaded by Enterprise Users will be disclosed to those individuals, who are in this case Individual Users.

To other users:

Data meant to be disclosed to other Users of the Service through interactions, communication or workflow within the Service will be disclosed to such other specific Users.

To partners and third-party service providers:

Personal data will also be shared with partners and third-party service providers, offering other products and services for purchases or subscriptions, if and when such products and services are used by Users. All such partners and third parties will use the personal data of Users in accordance with their own privacy practices.

To public:

Public profiles created by Individual Users will be available to anyone with the link to the profile or through search results. Personal information will also be disclosed when Users choose to share their actions or updates from the Service on other websites and/or social media sites. Users are responsible for all disclosures to the public or on other sites, and such other sites privacy practices may apply.

To new owner:

If the ownership or control of all or part of Our Services changes through any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer data as required to the new owner or controlling party.

To government and law enforcement offices:

Data may be disclosed to government departments and/or law enforcement offices for legitimate reasons where the request is placed through judicial, quasi-judicial or government orders in the jurisdictions that we operate in and in the jurisdictions of the data subjects.

DATA SECURITY

Data security during transit and at rest:

We use reasonable organizational, technical, and administrative measures to physically and digitally protect User data under Our control. We have stringent security measures in place to protect the loss, misuse, and alteration of the information under Our control. Whenever the Users change or access their account information, We offer the use of a secure server. Once the User's information is in Our possession, We adhere to strict security guidelines, protecting it against unauthorized access. We encrypt User data in transit as well as at rest, and also use secure sockets layer certificate to protect Users against identity theft, spyware, etc.

User responsibilities:

However, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If Users have reason to believe that their interaction with Our Services are no longer secure, it is their duty to immediately notify Us of the problem by contacting the support center and/or website and We shall take necessary action as We may deem fit, under the circumstances. We shall not be held responsible for any disclosure of information herein which results from the Users' failure to keep their data secure.

DATA OWNERSHIP AND RETENTION

Personal data ownership:

Individual Users own their respective data collected or created on the Services, and can choose to access, rectify, port, or erase their data. In the case of Enterprise Users who have uploaded employee data, the employees in this case become the Individual Users and Individual Users will own all personal data immediately upon collection of such data. Rights to modify or erase such personal data will be with the Individual Users.

Enterprise data:

Enterprise Users own all data uploaded or created using the Services, and can choose to access, rectify, port or erase their data. However, in case an Enterprise User has opted to share some specific data objects with employees, such as employee roles or ratings or accomplishments, then the employees acting as Individual Users will own such specific data objects. Data objects that can be shared with employees are configurable in the settings section of Services.

Usage preferences:

Users may be given ownership of some preferences for use of Services, including to notifications and service/ ad personalization. Users may change their preferences in the settings section of Services.

Data modification or deletion:

Other than for some sensitive personal data, Users may modify most of their personal data and other information directly from their profile section of the Services. For sensitive personal data, such as name or primary mobile number, modification is only allowed through the support center and after verification of government issued documentation.

Users can also delete some of the data directly from the Service. Enterprise User data will be erased upon discontinuation of Services, but a copy of anonymized data may be retained for analytical purposes. Individual Users may choose to completely delete their profile and data provided they are not part of Enterprise User group, in which case their personal data and other information will be erased from the Services upon request, but a copy of anonymized data may be retained for analytical purposes.

All the changes that Users require and request Us to make may not be effective immediately. We will endeavor to comply with the requests as soon as reasonably practicable.

Other data requests:

To review, suppress or otherwise limit Our use of Users personal data that has been previously provided to Us, if not possible directly on the Services, the Users must contact the support center and clearly describe the request. We will endeavor to comply with the requests as soon as reasonably practicable. However, if certain information by their inherent nature are not capable of suppression or removal then such information shall not be suppressed or removed or changed and We shall not be held responsible/liable for the non-compliance.

Data retention:

We shall not retain user data for longer than is necessary for the purpose for which it was collected. User personal information and other information will be erased when it's no longer required as outlined in this

DataPolicy, in part or in full, other than as required under any contract, by applicable law, for recordkeeping and archival, or for analytical purposes.

RESTRICTIONS

Access Restriction:

The Services shall not be used by minors. The Services are directed only to individuals who are permitted to share their personal data without parental consent. However, despite this caution, if such User were to provide such personal data, then We shall not be responsible for the same.

Data Restriction:

Users may submit their own personal data or personal data of other provided they have the right to do so. Users are requested not to upload any critical personal data. Users are strictly prohibited from uploading or providing links to any inappropriate content (political and religious views, propaganda materials, any obscene, indecent, vulgar, profane content, etc.) or content to which they don't have the usage rights (copyright, usage rights, intellectual property rights, as required).

EXCLUSIONS

Partners and third-party service providers:

This Data Policy does not address, and the We are not responsible for the privacy, information or other practices of any third parties, including any third party operating any website or app to which Our Services contain a link. The inclusion of a link on the Services does not imply endorsement of the linked website or app by Us. Such partners or third-party service providers may have their own privacy policies.

This Data Policy does not govern data or information shared by Users on third party websites, social media or any other data exchange systems. Any Personal Information that Users provide to such third-party websites or media will be subject to their privacy policy and not this Data Policy.

We are also not responsible for the collection, usage and disclosure policies and practices of other systems, tools, people or organizations, that could facilitate the Users to access Our Services including but not limited to third-party apps or sites or ad platforms providing a link to Our Service, device manufacturers, operating systems, browsers, internet/ wireless service providers, etc. We have no control over, and shall not be responsible for, any such third party's use/misuse of information.

UPDATES TO THIS DATA POLICY

We reserve the right to change, amend, modify, or alter this Data Policy, from time to time, at its sole discretion. We will endeavor to keep this Data Policy in alignment and compliance with the data protection regulations in the jurisdictions that we operate in and jurisdiction where data subjects are. The Users are advised to look at the "Last Updated" legend on the Services to see when this Data Policy was last revised. Changes made to this Data Policy will become effective when they are posted on the Services. The Users' use of the Services following these changes shall mean that they have accepted the revised Data Policy.

Last Updated: _____