COMPANY PRIVACY & POLICY

Dazzlo Enterprises Pvt Ltd

Effective Date: July 18, 2025

1. Introduction

At Dazzlo Enterprises Pvt Ltd ("Dazzlo," "we," "us," or "our"), we are committed to protecting the privacy and security of personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your information when you interact with us, including as a job applicant, employee, client, vendor, or user of our services and website. We adhere to applicable data protection laws and strive to maintain transparency in our data handling practices.

2. Scope of This Policy

This policy applies to all personal data processed by Dazzlo Enterprises, whether collected directly from individuals, through our website, or from third-party sources. It covers:

- Job Applicants: Individuals applying for positions with Dazzlo, including hybrid management and IT roles.
- Employees: Current and former employees of Dazzlo, including those working in hybrid and IT capacities.
- Clients: Businesses and individuals who use our recruitment services, email & WhatsApp bulk marketing software, and automation setup software.
- Vendors/Partners: Individuals or entities with whom we have business relationships.
- Website Users: Visitors to our website (www.dazzlo.co.in).

3. Information We Collect

We collect various types of information to provide our services and manage our operations. The type of information collected depends on your interaction with us:

1. For Job Applicants & Employees:

- **Personal Identifiers:** Name, contact details (address, email, phone number), date of birth, gender, nationality, photograph, government-issued identification numbers (e.g., PAN, Aadhaar, as required by law).
- **Professional Information:** Educational background, employment history, skills, certifications, resume/CV, cover letter, references, performance reviews, disciplinary records, training history.
- Financial Information: Bank account details (for payroll), tax information, salary, benefits, provident fund details.
- Sensitive Personal Data (where necessary and with explicit consent): Health information (for benefits, medical leave, or reasonable accommodations), background check results (criminal records, credit checks, where legally permissible), biometric data (if used for attendance or access control, with explicit consent and adherence to legal frameworks).
- o Login Credentials: For internal systems, software, and platforms used for work.
- o IT Usage Data: Information related to your use of company IT systems, networks, and devices (as detailed in Section 7).

2. For Clients & Vendors:

- o Contact Information: Name, job title, company name, business address, email address, phone number.
- Business Information: Company details, service requirements, payment information, contract details, service history.
- o Communication Data: Records of correspondence, meetings, and interactions.

3. For Website Users:

- Technical Data: IP address, browser type and version, operating system, device information, referral source, timestamps, clickstream data.
- Usage Data: Information about how you use our website, pages visited, time spent, clicks, search queries.
- · Voluntary Information: Any information you voluntarily provide through forms, surveys, or chat functions.

4. How We Collect Information

We collect information through various methods:

- **Directly from You:** When you apply for a job, submit inquiries, register for our services, provide feedback, participate in surveys, or interact with us via email, phone, video conferencing, or in person.
- From Third Parties: Recruitment agencies, professional networking platforms, public databases, previous employers (with consent), background check providers, and credit reference agencies (where legally permitted).
- Automated Technologies: Through cookies, web beacons, server logs, and similar tracking technologies when you visit our website or use our digital services.
- Internal Systems: Through your use of Dazzlo's IT systems, networks, and devices (as described in Section 7).

5. Lawful Basis for Processing Your Information

We process your personal information only when we have a lawful basis to do so. These bases include:

- **Consent:** Where you have given explicit consent for specific processing activities (e.g., for certain marketing communications, or processing of sensitive personal data). You have the right to withdraw your consent at any time.
- Contractual Necessity: Where processing is necessary for the performance of a contract with you (e.g., employment contract, service agreement) or to take steps at your request before entering into such a contract.
- Legal Obligation: Where processing is necessary for compliance with a legal or regulatory obligation (e.g., tax laws, labor laws, data protection regulations).
- Legitimate Interests: Where processing is necessary for our legitimate interests or those of a third party, provided your fundamental rights and freedoms do not override those interests (e.g., for internal administration, network security, fraud prevention, business improvement, recruitment processes, and client relationship management).
- Vital Interests: Where processing is necessary to protect your vital interests or those of another person (e.g., in medical emergencies).

6. How We Use Your Information

We use the collected information for the following purposes:

- Recruitment & Employment Management: To process job applications, assess qualifications, conduct interviews, manage HR functions, administer payroll and benefits, manage employee performance, facilitate training and development, ensure compliance with employment laws, and maintain accurate employee records.
- Service Delivery & Management: To provide and manage our recruitment services, email & WhatsApp bulk marketing software, and automation setup software to clients, including contract fulfillment, billing, and customer support.
- Business Operations & Administration: For internal record-keeping, financial management, auditing, risk management, legal compliance, and improving our internal business processes and operational efficiency.
- Communication: To respond to your inquiries, provide updates about our services, send important notices, and manage client and vendor relationships.
- Security & Fraud Prevention: To protect our systems, data, and users from unauthorized access, cyber threats, fraud, and other illegal activities.
- Website & Service Improvement: To analyze website and service usage patterns, diagnose technical issues, improve user experience, and optimize our digital offerings.
- Marketing & Business Development: To send promotional materials, newsletters, and information about our services, but only with your explicit consent where required by law.

7. How We Share Your Information

We may share your information with the following parties, strictly on a need-to-know basis and under appropriate safeguards:

- Internal Departments: With relevant departments within Dazzlo Enterprises (e.g., HR, IT, Sales, Operations, Finance) for legitimate business purposes.
- Third-Party Service Providers: Vendors who provide services on our behalf, such as payroll processing, IT infrastructure and support, cloud hosting, background check providers, legal and accounting services, and marketing platforms. These providers are contractually obligated to protect your information and use it only for the purposes for which we disclose it to them.
- Clients (for Recruitment Services): For job applicants, relevant professional information (e.g., resume, interview notes, skills assessment) may be shared with our clients for potential employment opportunities, typically with your consent or as an inherent part of the recruitment process.
- Legal & Regulatory Authorities: When required by law, court order, government request, or to protect our legal rights, property, or safety, or the rights, property, or safety of others.
- Business Transfers: In connection with a merger, acquisition, reorganization, or sale of all or a portion of our assets, your personal information may be transferred to the acquiring entity.
- Professional Advisors: With our auditors, legal advisors, and other professional consultants.

8. International Data Transfers

As a global-facing company, your personal information may be transferred to, stored, and processed in countries other than your own, including outside of India, where data protection laws may differ. When we transfer your information internationally, we take appropriate safeguards to ensure your data remains protected in accordance with this Privacy Policy and applicable laws. These safeguards may include:

- Transferring data to countries deemed to provide an adequate level of data protection by relevant authorities.
- Implementing standard contractual clauses or other legally approved mechanisms.
- Obtaining your explicit consent for such transfers where required.

9. Employee Monitoring and IT Usage Policy (Applicable to Employees)

To ensure the security of our systems, protect confidential information, maintain productivity, and comply with legal obligations, Dazzlo Enterprises may monitor the use of its IT systems, networks, and devices. This includes, but is not limited to:

- Monitoring of company-provided email, communication platforms, and internet usage.
- Logging of access to company systems and data.
- Monitoring of software installations and usage on company devices.
- Use of security software to detect and prevent unauthorized access or data breaches.

Employees are expected to use company IT resources primarily for business purposes. Any personal use should be minimal and should not interfere with work duties or violate company policies. Employees will be notified of any monitoring activities in accordance with applicable laws.

10. Data Security

We implement robust technical and organizational measures to protect your personal information from unauthorized access, loss, misuse, alteration, or destruction. These measures include:

- Encryption: Encrypting data both in transit and at rest where appropriate.
- Access Controls: Implementing strict access controls and role-based access to personal data.
- Network Security: Utilizing firewalls, intrusion detection systems, and other network security measures.
- Regular Audits: Conducting regular security assessments, vulnerability scans, and penetration testing.
- Employee Training: Providing mandatory data privacy and security awareness training to all employees.
- Data Minimization: Collecting and retaining only the data necessary for stated purposes.

While we strive to protect your data, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security. In the event of a data breach, we will comply with all applicable notification requirements.

11. Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, including for legal, accounting, or reporting requirements. The specific retention periods depend on the nature of the data and the purpose of processing:

- **Job Applicant Data:** Retained for a reasonable period (e.g., 6-12 months) for future opportunities, unless you request earlier deletion or a longer retention period is legally required.
- Employee Data: Retained as per employment laws, tax regulations, and company policies, typically for several years after the termination of employment.
- Client/Vendor Data: Retained for the duration of the business relationship and for a period thereafter as required by legal
 obligations or legitimate business interests.
- Website Usage Data: Retained for analytical purposes for a limited period, typically anonymized or aggregated.

When personal data is no longer required, we will securely delete or anonymize it.

12. Your Rights

Depending on applicable data protection laws (e.g., GDPR, CCPA, Indian data protection principles), you may have the following rights regarding your personal information. We are committed to facilitating the exercise of these rights:

- Right to Access: Request a copy of the personal data we hold about you and information about how we process it.
- Right to Rectification: Request the correction of inaccurate or incomplete personal data.
- **Right to Erasure (Right to be Forgotten):** Request the deletion of your personal data under certain circumstances (e.g., if the data is no longer necessary for the purposes for which it was collected).
- **Right to Restriction of Processing:** Request that we limit the way we use your data under certain conditions (e.g., if you contest the accuracy of the data).
- Right to Object to Processing: Object to our processing of your data for certain purposes, including direct marketing.
- Right to Data Portability: Request your personal data in a structured, commonly used, machine-readable format, and have it transmitted to another controller where technically feasible.
- **Right to Withdraw Consent:** Withdraw your consent at any time where we rely on consent to process your personal data. This will not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with a relevant data protection authority if you believe your rights have been violated.

To exercise any of these rights, please contact us using the details provided in Section 14. We may need to verify your identity before fulfilling your request.

13. Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies (like web beacons, pixels) to enhance your browsing experience, analyze site traffic, personalize content, and understand user behavior.

- Essential Cookies: Necessary for the website to function correctly.
- Analytical/Performance Cookies: Help us understand how visitors interact with our website by collecting and reporting information anonymously.
- Functionality Cookies: Used to remember your preferences and choices (e.g., language or region).
- Targeting/Advertising Cookies: Used to deliver more relevant advertisements to you based on your interests.

You have the option to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Please note that disabling cookies may affect the functionality of our website.

14. Third-Party Links

Our website and services may contain links to third-party websites, applications, or services that are not operated by us. This Privacy Policy does not apply to those external sites or services. We encourage you to review the privacy policies of any third-party sites or services you visit or interact with, as we have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

15. Children's Privacy

Our services and website are not intended for individuals under the age of 18. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected personal information from a child without parental consent, we will take steps to delete that information as quickly as possible. If you believe that we might have any information from or about a child, please contact us.

16. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our data processing practices, legal requirements, or business operations. We will notify you of any significant changes by:

- Posting the updated policy on our website with a revised "Effective Date."
- Sending an email notification to registered users where appropriate.
- Displaying a prominent notice on our website.

We encourage you to review this policy periodically to stay informed about how we are protecting your information.

17. Contact Us & Grievance Redressal

If you have any questions, concerns, or complaints about this Privacy Policy or our data practices, or if you wish to exercise your data protection rights, please contact our Data Privacy Officer / Grievance Officer at:

Dazzlo Enterprises Pvt Ltd

Email: info@dazzlo.co.in Phone: +91 9373015503

Address: Kalyan, Maharashtra, India

We will respond to your request or complaint as soon as reasonably possible and in accordance with applicable laws.

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