

PRIVACY POLICY

By visiting and/or accessing our website www.oorwin.com (“**Website**”) and the Oorwin mobile application (“**App**”, together “**Platforms**”), you agree to be bound by the terms of this Privacy Policy. This Privacy Policy is a part of the Terms of Use available at [Privacy Policy](#) Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Use.

The terms “we”, “us”, “our”, “Company” shall mean Oorwin Labs Inc (“**Company**”, which expression shall, wherever the context permits, admits or requires, be deemed to mean and include its successors in interest and permitted assigns) which operates the Platforms. The Company offers you a technology platform via the Platforms which helps you automate your human resources management and recruitment activities. The terms “you” or “user” refers to any natural or legal person who has agreed to become a registered user on the Platforms by providing information while registering on the Platforms or who accesses/visits the Platforms.

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our services or access the Platforms. By visiting our Platforms and/or by providing your information and/or by availing our services, you consent to the collection, storage and use of the information you disclose on our Platforms in accordance with this Privacy Policy, including but not limited to, your consent for sharing your information as per this Privacy Policy.

1. Types of Data Collected

Personal Data: When you seek to register with us, we may ask you to provide us with certain personally identifiable information like:

- Name, e-mail address, mobile number, and other profile data provided for the registration purpose.
- Any information that you enter into the Platforms, including, corporate entity details, contact details, like address, phone number, email id, etc., login details.
- Certain information relevant to your subscription including, your credit card details, your billing address, etc.

During the registration process, we indicate fields that are mandatorily required to be filled and fields that are optional. In the event you choose to decline to submit information on the Platforms, we may not be able to provide certain services to you and shall not be liable or responsible for non-provision of services to you. Any information freely available and/or accessible in the public domain will not be considered as sensitive and confidential.

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

Data to provide our services: Upon subscription when you start using our services, you may upload or provide certain information and documents on our Platforms so we can provide our services to you. We will use the data only for the purpose of providing our services and as per the Terms of Use and the master subscription agreement that you enter into with us. This information may include your and your employee/third party data collected, used, processed, stored, or generated as the result of the use of the Platforms and our services, including, without limitation, the reports and analysis generated through our services.

Usage Data: On our Website, you can browse without telling Us who You are or revealing any personal information about yourself. However, we may automatically track certain information about You based on your behavior on our Website. This information may include:

- Your IP address;
- The website from which you were referred to our website (e.g. if you followed a link);
- The webpages you are visiting on our website;
- The browser you are using and its display settings;
- The date and duration of your visit.

The information may also include the pages of our Platforms that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Location Data: We may use and store information about your location if you give us permission to do so. We may also derive your approximate location from your IP address.

Device Data: We may collect information about your mobile/hardware device, including, for example, the hardware model, your mobile device unique ID, the IP address of your mobile device, operating system and version, software and file names, preferred language, unique device identifier, advertising identifiers, serial number, device motion information, and mobile network information.

Tracking Cookies Data: We use cookies and similar tracking technologies to track the activity on our Platforms and hold certain information, including to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies are files with small amount of data which may include an anonymous unique identifier.

When you access our Website, we will use cookies. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Platforms. We do not control the use of cookies by third parties.

2. Use of Data

You further acknowledge, consent and agree that the Company may use, access, preserve and disclose your account information i required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to:

- provide our services and maintain our Platforms
- allow you to participate in interactive features of our Platforms when you choose to do so
- gather analysis or valuable information so we can improve our products and services and measure consumer interest in our services
- if you have opted to receive, provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about
- comply with legal process nationally or internationally
- detect and protect us against error, fraud and other criminal activity and to enforce the Terms of Use and this Privacy Policy
- respond to claims that any Content violates the rights of third parties
- resolve disputes that may arise with the use of our services
- protect the rights, property or personal safety of the Company, its users and the public
- for internal record keeping.

As a processor of data, our Privacy Policy applies to the technological tools we provide you for controlling, managing and retaining data. We provide you the technology to enter, update, organize, deliver, transmit, display and secure data relating to company and your employees or other third parties whose information you control.

From time to time, we may use the information to customize the Platforms, or our services according to your interests/requirements.

We identify and use your IP address to help diagnose problems with our server, and to administer our Platforms. Your IP address is also used to help identify You and to gather broad demographic information.

We may use the information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users. This information is compiled and analysed on an aggregated basis.

You understand that you are the controller of the data that we as a service provider process for you. Accordingly, you control the data that we process for you and you own, manage or leverage data, for which we provide you the technological means. Controllers decide the purposes and ends of processed data. As controllers, you understand that you are expected to fulfill several responsibilities with respect to protecting the data you hold, and which we process.

3. Accessing and updating Personal Information: We shall provide you access to your information, upon request from you, and shall further ensure that any information found to be inaccurate or deficient shall be corrected, subject to any requirement for such information to be retained by law or for legitimate business purposes. You may at any time, download your data by contacting us. We may decline to process requests that are unreasonable or extremely impractical or jeopardize the privacy of others. Even after you delete your information, residual copies may remain in our backup systems.

Usually, we have no direct relationship with the individuals whose personal information we may process. We recommend that if you seek to access, or seek to correct, amend, or delete personal information you should direct your query to our clients (the data controller). If requested to remove data by our clients, we will do so immediately. You may also submit such inquiries or requests to us directly by contacting info@oorwin.com.

4. Transfer of Data: Your information, including personal data, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside United States and choose to provide information to us, please note that we transfer the data, including personal data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

5. Disclosure of Data

We may share your information with our affiliate and group companies and their respective officers and employees and/or third-party service providers with whom we enter into to provide certain services to you, if required, for the purpose of providing services. We shall ensure that the recipients of such information agree to process the information based on our instructions and in compliance with this Privacy Policy and other relevant confidentiality and security measures. The information collected from You and other users may be analyzed in different manners.

We share your information with payment service providers when you make use of your subscription services for the purpose of facilitating payment. By submitting your information, you grant us the right to provide the information to these third parties subject to our Privacy Policy.

We may disclose your personal information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to notices, court orders, law enforcement agencies or in other legal processes. We may disclose personal information to law enforcement offices, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to enforce our Terms of Use or Privacy Policy or protect the rights, property or personal safety of our users or the general public.

We and our affiliates will share some or all of the collected information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity, or re-organization,

amalgamation, restructuring of business. Should such a transaction occur, that other business entity (or the new combined entity) will be required to follow this Privacy Policy with respect to all the information collected.

6. Storage and Security of Data: The security of your data is important to us. All information is encrypted and saved/stored on servers or our cloud database, which are secured with passwords and pins to ensure no unauthorized person has access to it. Once your information is in our possession we adhere to strict security guidelines, protecting it against unauthorized access. However, remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. We will inform you within [72 hours] in case of any breach of security to your data.

7. Links to Other Sites: Our Platforms may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. These companies may additionally use information about your visits to this and other platforms to provide advertisements about services of interest to you. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

8. Changes to This Privacy Policy: We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and sending you an email on your registered email id, if you have subscribed to our services. Please do not continue to use or access our Platforms if you do not agree to the terms herein.

9. The GDPR and Additional Information for Individuals in the European Economic Area ("EEA"):

If you are a resident of the European Economic Area ("EEA") and accessing our Platforms or subscribing to our services, please note:

- a. The EU General Data Protection Regulation (GDPR) is a new comprehensive data protection law that updates existing EU laws to strengthen the protection of "personal data" (any information relating to an identified or identifiable natural person, so called "data subjects"). The GDPR replaces the current national data protection laws with a single set of rules, enforceable in each EU member state.
- b. We may need to collect and process the data stated above in order to provide our services to you or because we are legally required to do so. If you do not provide the information that we request, we may not be able to provide you with our services. We may use the data for our legitimate business interests, including those listed above.
- c. We do not knowingly permit children in the EEA under age 16 to register for any content, product or Service. We do not knowingly collect, use or disclose personal information about users under age 16, except as permitted by law.
- d. If you would like to receive an electronic copy of your Personal Information for purposes of transmitting it to another company, you may contact us at info@oorwin.com
- e. In relation to the sections above on "Transfer of Data" and "Storage and Security of Data" some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. For transfers from the EEA to countries not considered

adequate by the European Commission, we have put in place measures such as standard contractual clauses adopted by the European Commission to protect your data. Additionally, we shall retain your data for as long as needed or permitted in light of the purposes for which it was obtained. This includes, (i) any contractual relationship we may have with you to provide our services and (ii) as required by law or our legal position (such as in litigation or regulatory investigations). To receive information on any such measures, you may contact us at info@oorwin.com

- f. If you have any questions in relation to this privacy policy or if you would like to lodge a complaint, please contact us at info@oorwin.com. You may also lodge a complaint with a supervisory authority competent for your country or region.

10. Opt-Out

- a. You have the option to opt-out of receiving non-essential (promotional, marketing-related) communications from us or on behalf of our partners, after providing us with personal information. If you want to remove your contact information from all lists and newsletters, please contact info@oorwin.com.

- b. If you choose to unsubscribe from the Platforms or delete any or all of information, you may send an e-mail to info@oorwin.com. We may still retain some information, documents, and record of transactions as required by any law, contract or policy applicable to us.

11. Contact Us

In case of any grievance arising from the use of the Platforms, please contact the Grievance Officer, the details of which are set forth below: info@oorwin.com