

## Privacy Policy

**Effective Date:** 17-Apr-2025 **Last Updated:** 17-Apr-2025

Welcome to the website of **Xpheno Private Limited** ("Company", "we", "our", or "us"). We are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your data when you interact with our website and services namely in the field of recruitment and selection, mediation, temporary staffing, secondment, payroll, training, and personnel and salary administration as further described in the Terms and Conditions (collectively "Services") and the processing of personal data of persons who work for companies with which we conduct (or intend to conduct) business.

This Policy complies with the **Information Technology Act, 2000**, and the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011** under Indian law. By using our services or accessing our website, you consent to the practices described in this Privacy Policy

### 1. Introduction to the Company

Xpheno Private Limited is a staffing and talent solutions company in India, founded in 2016. It offers a range of services, including Direct Hire, RPO, IT Staff Augmentation, and Executive Search, aiming to connect people with the right roles to create high-performing workforce. The company's philosophy emphasizes "People Effect Change," recognizing the impact individuals have on organizations and the ecosystem.

### 2. Scope of this Policy

This Privacy Policy applies to:

- Visitors to our website [www.xpheno.com](http://www.xpheno.com)
- Job seekers and applicants who submit their personal information
- Clients and prospective clients of our recruitment and contract staffing services
- Users who interact with us via web forms, email, phone, or other channels

### 3. Information We Collect

When you visit our website, we gather information that relates to your device, your browser and to the way you navigate our website content and we may collect the following categories of personal and sensitive personal data such as:

#### a. Personal Information:

- Full name

- Contact details (email address, phone number, postal address)
- Date of birth
- Gender

**b. Employment-Related Information:**

- Resume/CV
- Educational background
- Work history and references
- Skills, certifications, and language proficiencies
- Job preferences (location, salary, type of employment, etc.)

**c. Sensitive Personal Data or Information (SPDI):**

- Government-issued ID (e.g., PAN, Aadhaar)
- Financial information (e.g., salary, bank details – if relevant to contract employment)
- Background verification data
- Health data (only if required for job placement and with consent)

**d. Automatically Collected Information:**

- IP address
- Device/browser information
- Website usage data (via cookies and analytics tools)
- geographic location (country only)
- preferred language used to display
- the date and time of access to the website
- the internet address from which you were directly linked through to our website
- the control system that you use
- the parts of the website that you visit
- the pages of the website that you have visited and the information that you viewed
- the hyperlinks you have clicked
- the material that you send to or download from our website

**4. Purpose of Data Collection**

We collect and process your personal data for the following purposes:

1. **CANDIDATE AND PROSPECTIVE CANDIDATE PERSONAL DATA:** The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. Where appropriate and in accordance with local laws and requirements, we will also use your personal data to

provide recruitment and staffing services or things like marketing our services to you, profiling and diversity monitoring, preparing analysis reports. We will use your information to get in touch with you about our services and to evaluate your suitability for job opportunities, to share your profile with potential employers (with your consent), to communicate with you regarding jobs, interviews, or queries

2. **TEMPORARY WORKER DATA:** If we employ or engage you directly as a Temporary Worker, the main reason for using your personal details is to ensure the smooth running of our Temp Relationship and to comply with our contractual and other duties to each other, and to our Clients, as part of our Temp Relationship and our duties to third parties such as tax authorities and government agencies.
3. **CLIENT DATA:** The main reason for using information about Clients is to enable us to introduce ourselves to you and to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. To fulfil contractual obligations with you. This will involve: (i) identifying Candidates who we think will be the right fit for you or your organisation; (ii) providing you with RPO services (or assisting another organisation to do so); and/or (iii) providing services to your employees, such as training courses to teaching staff who work for our Clients. The more information we have, the more bespoke we can make our service.
4. **SUPPLIER DATA:** The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.
5. **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDANTS:** We use referees' personal data to help our Candidates to find employment which is suited to them. If we are able to verify their details and qualifications, we can make sure that they are well matched with prospective employers. Where a referee is being asked to give a reference based on their professional experience of a Candidate, and where we think that they may be interested in becoming a Client of ours, we may also use their details to reach out to get in touch in that alternative capacity. We use the personal details of a Candidate or Staff member's emergency contacts in the case of an accident or emergency affecting that Candidate or member of Staff. We use the personal data of the dependants or other beneficiaries of Staff to allow that Staff member to access certain benefits or employment rights.
6. **WEBSITE USERS:** We use your data or internal record keeping and data analysis and to comply with legal obligations, it help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs to you that we think you'll be interested in. If you are also a Candidate or Client of Xpheno, we will use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

## 5. Consent

By using our website or submitting your information, you provide your **explicit consent** to the collection, processing, and sharing of your data in accordance with this Privacy Policy.

You may withdraw your consent at any time by contacting us at [privacy@xpheno.com](mailto:privacy@xpheno.com). However, this may affect our ability to provide certain services.

## 6. Sharing and Disclosure of Information

We do not sell your Personal Information. We may disclose certain categories of Personal Information about you for the business purposes mentioned in this Notice to the following categories of third parties:

- **Potential Employers or Potential Customers** – We may disclose your contact information, professional and work eligibility information, career planning information, demographic information, and other information you ask us to disclose to a customer for the purpose of providing our Services (for example, for opportunities we believe are of interest to you for our recruitment business). Customers of Xpheno will process such Personal Information in accordance with their own policies and procedures.
- **Vendors, Contractors, and other Service Providers** – We use vendors, contractors, and other service providers to assist us in providing our Services, and it may be necessary for us to provide access to some of the categories of your Personal Information (for example, Background verification and assessment agencies, IT operating system and platform vendors who support our systems, SaaS vendors such as applicant tracking systems, customer relationship management systems and back office systems, assessment services, marketing services vendors, attorneys and accountants as well as premises and other security management vendors, including video security at our office locations). These companies will have access to your Personal Information as necessary to perform their functions, but they may only use that information for the purpose of providing the services and are obligated to protect the Personal Information.
- **Business Transfer Partners** – Circumstances may arise where, whether for strategic or other business reasons, Xpheno decides to sell, buy, merge, or otherwise reorganize businesses. Such a transaction may involve, in accordance with applicable law, the disclosure of Personal Information to prospective or actual purchasers, or the receipt of it from sellers.

- **Vital Interests and Legal Rights** – We may collect and possibly share any or all of the categories of Personal Information in order to establish or exercise our legal rights or defend against legal claims or investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of Xpheno’s terms of use or this Notice. Potential employers or clients for recruitment purposes
- **Courts, Regulators, Law Enforcement and Government Authorities** – We may disclose your Personal Information where we are legally required to do so in order to respond to or comply with any applicable law, regulation, subpoenas, court orders, legal process, or government requests, including in response to public authorities to meet national security or law enforcement requirements. We also may disclose your Personal Information when we choose to establish or exercise our legal rights or defend against legal claims or to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of Allegis Group’s terms of use, its policies or this Notice.

Please note that if you post any Personal Information in a public area of our Site(s), the information that you share will be visible to others and can be read, used, or collected by others. We are not responsible for the way others may use Personal Information you post to public areas of the Site(s).

## 7. Your Rights

We respect your privacy rights related to the Personal Information we collect, use and disclose about you and we will comply with applicable data protection laws and regulations in the handling of your Personal Information. The availability of these rights and the ways in which you can exercise them are set out below.

Under certain conditions, you have the right:

- to be informed of our processing activities and to make decisions with respect to your Personal Information in accordance with applicable law;
- to be informed of all third parties to whom your Personal Information is shared along with a description of the Personal Information;
- to consult and copy your Personal Information;
- to correct, complete, or supplement your Personal Information if the information we hold is inaccurate or incomplete;
- to request the deletion of any Personal Information that we no longer have a lawful ground to use; if deletion is technically unfeasible or we are required by law to keep the information longer, we will stop all processing activities in connection with your

Personal Information except for storing the same by taking necessary security measures;

- to limit or refuse the processing of your Personal Information in accordance with applicable law;
- to request that we explain our processing rules for your Personal Information;
- to object to direct marketing (including any profiling for such purposes); and

Your exercise of these rights is subject to certain exemptions and limitations required or permitted by law.

## 8. How to Exercise Your Privacy Rights

For all requests, after submitting the request, we will require additional information to reasonably verify your identity depending on the nature of your request.

We will abide by all applicable legal requirements for deadlines for responding to your request and will collect the minimum Personal Information necessary to verify your identity.

To exercise these rights, contact us at:

**Email:** [Privacy@xpheno.com](mailto:Privacy@xpheno.com)

**Address to & Address:** Data Privacy Officer Xpheno Private Limited, XpressionONE, 76, 3rd Cross, Residency Rd, near Federal Bank, Bengaluru, Karnataka 560025

## 9. Cookies and Tracking Technologies

Our website may use cookies and similar tools for:

- Website functionality
- Analytics and performance tracking
- Remembering user preferences

You may control cookies through your browser settings. Disabling cookies may affect some features of our website.

## 10. Security of Your Personal Information

We follow **reasonable security practices** to protect your data against loss, misuse, unauthorized access, alteration, or disclosure, including:

- Secure servers and encrypted communication channels
- Role-based access controls
- Regular security audits

However, no method of transmission over the internet is 100% secure. We cannot guarantee absolute security.

Electronic communication (e.g., email, online chat, or instant messaging, etc.) you send to us may not be secure unless we advise you in advance that security measures will be in place prior to you transmitting the information. For this reason, we ask you do not send Personal Information such as financial information, social security numbers or passwords to us through unsecured electronic communication. Users should also take care with how they handle and disclose their Personal Information.

## **11. Data Retention**

We retain Personal Information we collect from you where we have an ongoing business need to do so (for example, to provide you with the Service you have requested, to maintain you in our talent pool to be potentially contacted about other employment opportunities, or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

## **12. Links to Other Sites and Public Forums**

Our Sites may contain links to other sites for your convenience and information. If you access those links, you will leave our Sites. We do not control those sites or their privacy practices, which may differ from Xpheno's practices. Xpheno is not responsible for the privacy practices or the content of other websites outside of Xpheno. The Personal Information you choose to provide or that is collected by these third parties is not covered by this Notice. We encourage you to review the policies of such third parties before submitting your Personal Information.

## **13. Complaints About How We Handle Your Personal Information**

If you wish to make a complaint about our handling of your Personal Information or an alleged breach of the privacy principles under applicable law, please complete the web form [here](#). You will need to provide us with sufficient details regarding your complaint as well as any supporting evidence and/or information.

We will refer your complaint to our Privacy Officer who will investigate the issue within a reasonable time frame, which is usually 30 days but may be longer if the matter is complex. Our Privacy Officer will determine the steps (if any) that we will undertake to resolve your complaint. Such steps may include discussing the options for resolving the complaint with you, notifying relevant employees the subject of a complaint and seeking their input or escalation.

We will contact you if we require any additional information from you and will notify you in writing of the outcome of our investigation.

#### **14. Changes to This Privacy Policy**

We may revise this Privacy Policy from time to time. Any changes will be posted on this page with an updated effective date. We encourage you to review this policy periodically.