

## PRIVACY POLICY

Effective Date: 01/12/2025

4E Software Private Limited along with all its group companies including subsidiaries (referred to as “we”, “us”, “our”, “Company”, or “Caizin”), owns and operates <https://www.Caizin.com> (the “Site”) and is committed to protecting the personal data of users (collectively “you”, “your”, or “User(s)”), i.e., the information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you within the context of you utilising the Site (“Personal Data”). This Privacy Policy describes how we collect, use, store, process, share and protect Personal Data in compliance with the Digital Personal Data Protection Act, 2023 (“DPDP Act”), the Digital Personal Data Protection Rules, 2025 (“DPDP Rules”) and other applicable laws.

By accessing or using the Site or our services on the Site (“Services”), or by providing your Personal Data to us, you:

- (a) acknowledge that you have read and understood this Privacy Policy; and
- (b) provide explicit, informed, specific, and freely given consent for the collection and processing of your Personal Data as described herein.

If you do not agree to this Privacy Policy, please refrain from using the Site or Services, exercise your right to withdraw consent where applicable. We maintain records of all consent and processing activities in compliance with the DPDP Act.

If you use the Services on behalf of another individual or an entity, you represent that you have lawful authority to do so, and that you will ensure that such individuals/entities are informed of this Privacy Policy and their rights under the DPDP Act.

### 1. LEGAL BASIS AND SCOPE

- 1.1. This Privacy Policy is published to provide transparency and ensure compliance with applicable law. It explains the categories of Personal Data we collect, the purposes and legal grounds for processing, the recipients of Personal Data, retention practices, and the rights available to you under the DPDP Act.
- 1.2. We are committed to processing data in a lawful, fair, and reasonable manner, and in accordance with the principles of data minimization, purpose limitation, and storage limitation. We also implement privacy by design in our systems and processes and conduct periodic audits and risk assessments (as applicable), including Data Protection Impact Assessments (DPIAs), where required to ensure ongoing compliance and protection of your Personal Data.

### 2. CATEGORIES OF DATA WE COLLECT AND PROCESS

We collect Personal Data in three primary ways:

- 2.1. Directly from You: When contacting Us for support / engagement or otherwise, submitting feedback, submitting work profile, or using our Services, including identity information such as full name, date of birth, gender, photograph, signature, and nationality, contact information such as email, phone, addresses, and emergency contacts, professional and business information such as employer, job title, qualifications, and skillsets, account preferences, and communications with our teams. We will explicitly seek consent prior to collection of any sensitive personal data such as financial information, health data, biometric data, or other information classified as sensitive under the DPDP Act.

- 2.2. *Automatically Collected Data:* When you access or use our Site, platform, or applications, we may automatically collect technical and behavioral data when you access or use the Site or Services, including device information, IP address, browser type, operating system, diagnostic and usage data, cookies, and tracking information. Non-essential cookies, such as those used for analytics or marketing, are used only with your explicit consent and may be managed or withdrawn at any time through your browser settings or our consent management interface.
- 2.3. *Third Party Sources:* Personal Data received from third-party sources, such as service providers including cloud hosting, analytics, identity verification, and payment processors, social media platforms, third-party applications you choose to connect, publicly available sources such as government registries, corporate filings, and directories, or business partners offering joint services. All Personal Data obtained from third-party sources shall be processed exclusively for the purposes specified in this Privacy Policy and in accordance with the lawful bases prescribed under the DPDP Act, including, as applicable, explicit consent, necessity for the performance of a contract, compliance with legal obligations, or legitimate interests.
- 2.4. Further, the Site may contain links to third-party websites or services. This Policy does not apply to such third-party sites, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of those third parties before proceeding to such websites.

### **3. PURPOSES OF PROCESSING**

- 3.1. We use Personal Data to provide, maintain, manage, and improve our Services, fulfill contractual obligations, respond to inquiries, personalize user experiences, conduct research and analytics in anonymized form, and communicate marketing updates (only if you have provided explicit consent).
- 3.2. We also process data to comply with legal obligations, protect our legitimate interests, prevent fraud, and ensure security. All processing is based on legal grounds provided under the DPDP Act, including explicit consent, necessity for contract performance, compliance with legal obligations, or legitimate interests, provided such interests do not override your rights and freedoms. We do not perform any automated decision-making that produces legal or similarly significant effects on Users without appropriate safeguards, including user contestation rights and human intervention where applicable.

### **4. SHARING AND DISCLOSURE OF PERSONAL DATA**

- 4.1. Caizin may periodically provide or make the Personal Data of the Users available to third-party contractors at their own discretion who work on behalf of or with Caizin to provide Services, perform analytics, marketing, or otherwise assist Caizin to maintain the Site. Such contractors are bound by contractual obligations to use Personal Data only for the purposes of providing services to Caizin and do not have any independent right to share this information. We take reasonable steps to ensure that such third parties process Personal Data lawfully and in compliance with DPDP safeguards, and they are contractually obligated to maintain confidentiality and security of the data.
- 4.2. We may also share data with business partners or affiliates for limited purposes and with your consent where required. In the event of a business transfer, such as a merger, acquisition, or reorganization, Personal Data may be transferred to a successor or affiliate under appropriate contractual, organizational, and technical safeguards to ensure that your Personal Data continues to be protected in accordance with applicable law.
- 4.3. We may also disclose Personal Data to government authorities, courts, or regulatory bodies when required by law legally or when necessary to protect legal rights, property or public safety. We do not sell or rent Personal Data to third parties.

- 4.4. We have implemented technical, organizational, and administrative security measures to protect the Personal Data that we have under our control from unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorized access to the User's electronic devices through which the User avails the Services, Caizin shall not be held liable for any loss incurred by or to the User.

## 5. DATA RETENTION & ERASURE

- 5.1. We retain Personal Data only for as long as necessary to fulfill the purposes for which it was collected, or as required by law, regulatory obligations, or legitimate business purposes.
- 5.2. Personal Data that is no longer required for these purposes outlined in this Privacy Policy is either securely deleted, anonymized, or otherwise irreversibly de-identified to prevent identification of individuals. Retention periods may vary depending on the type of data, contractual obligations, or statutory requirements, but in all cases, we take reasonable steps to ensure that data is not retained longer than necessary.
- 5.3. You have the right to request erasure of your Personal Data when it is no longer necessary for the purposes for which it was collected, when you withdraw consent, or when there is no other lawful basis for its continued processing. Requests for erasure, or for discontinuation of processing, can be submitted to our Grievance Officer, and we will take all reasonable steps to comply without undue delay. In some cases, we may be unable to delete Personal Data immediately if retention is required to comply with legal obligations, defend legal claims, or fulfill other legitimate purposes under the DPDP Act.

## 6. YOUR RIGHTS (DATA PRINCIPAL RIGHTS)

- 6.1. Right to Information: You have the right to request detailed information about the Personal Data we hold about you, including the categories of data collected, the sources from which it was obtained, the purposes for which it is being processed, the types of processing activities performed, the categories of third parties with whom your data has been shared, and the retention period or criteria used to determine the retention of your Personal Data.
- 6.2. Right to Correction or Modification: You also have the right to request correction, completion, or updating of any Personal Data that is inaccurate, incomplete, misleading, or outdated. Upon receiving such a request and verifying your identity, we will take all reasonable steps to update or correct your Personal Data within a commercially reasonable timeframe, or provide an explanation if we are unable to comply due to legal, operational, or technical constraints.
- 6.3. Right to Nominate: You have the right to nominate an individual who may exercise your data protection rights on your behalf in the event of your death, incapacity, or as otherwise authorized by you. Such nominations must be communicated to us in writing, and upon verification, we will recognize the nominated individual to act on your behalf in matters relating to access, correction, portability, or erasure of Personal Data.
- 6.4. Right to Portability of Information: Where applicable, you have the right to request data portability, which allows you to receive your Personal Data in a structured, commonly used, and machine-readable format, and to request that such data be transmitted to another data fiduciary, where technically feasible. This right ensures you can move your Personal Data across service providers without hindrance, subject to reasonable safeguards to protect privacy and security.
- 6.5. Right to Grievance Redressal: You have the right to lodge a grievance with our Grievance Officer or, where necessary, with the Data Protection Board of India, regarding any alleged non-compliance with the DPDP Act or this Privacy Policy. We are committed to addressing all

requests, complaints, or grievances in a timely, transparent, and fair manner. All requests will be acknowledged, processed within reasonable timeframes, and communicated to you with the outcomes and any actions taken.

- 6.6. Exercising these rights may require you to provide sufficient information to verify your identity to ensure that Personal Data is not disclosed to unauthorized parties. We maintain records of requests and actions taken to comply with these rights, in accordance with the DPDP Act and associated rules.

## **7. CHILDREN & MINORS**

- 7.1. Our Services are not intended for individuals under 18 years of age, and we do not knowingly collect Personal Data from minors. If we discover that Personal Data of a minor has been collected without parental consent, we will promptly delete it.
- 7.2. If in the future we provide services to minors, we will implement additional safeguards, including obtaining verifiable parental or guardian consent before collecting any Personal Data from a minor. Minors' data collection will be limited to what is strictly necessary for providing the Services, and minors' rights under the DPDP Act will be respected. Minors, through their parent or guardian, will have the right to: (i) access their Personal Data collected through the Services; (ii) request correction or completion of inaccurate, incomplete, or outdated Personal Data; (iii) request erasure of their Personal Data when it is no longer necessary for the purposes for which it was collected; (iv) withdraw consent for processing of their Personal Data where processing is based on consent; (v) exercise the right to data portability where technically feasible; and (vi) lodge grievances regarding non-compliance with the DPDP Act or this Privacy Policy, through their parent or guardian.
- 7.3. All requests or actions on behalf of a minor must be submitted or authorized by the parent or guardian, and we will verify such authority before taking any action.

## **8. COOKIES, TRACKING & CONSENT MANAGEMENT**

We may use cookies and similar technologies to enhance the user experience, administer the Site, conduct analytics, and support security. Non-essential cookies require explicit consent, which you may manage or withdraw at any time. You can change your cookie preferences through your browser settings. Please note that blocking or disabling cookies may affect your ability to use certain features of our platform. If collected, the cookies used for non-essential purposes (e.g., analytics, marketing) are subject to explicit consent.

## **9. DATA SECURITY & BREACH NOTIFICATION**

- 9.1. We implement appropriate technical and organizational security measures to protect Personal Data from unauthorized access, disclosure, modification, loss, or destruction. Measures include encryption, access controls, monitoring, and periodic audits.
- 9.2. Access to Personal Data is limited to authorized personnel on a need-to-know basis, and third-party processors are contractually obligated to maintain security and assist in compliance with the DPDP Act, including breach notification and mitigation. We periodically review and audit third-party security practices.

While we take all reasonable steps to protect Personal Data under our control, Caizin cannot be held responsible for breaches caused by factors beyond our reasonable control, including actions of third parties not under contract with us, or events such as government acts, cyberattacks, or failures of the User's systems. We ensure that all reasonable precautions and safeguards required under the DPDP Act are implemented.

- 9.3. In the event of a personal data breach, we will notify the Data Protection Board of India promptly and provide a detailed report within 72 hours, as well as notify affected Users regarding the nature, consequences, and mitigation steps.

## **10. INTERNATIONAL TRANSFER**

Your Personal Data may be processed and stored in India, and in certain cases may be transferred to service providers affiliates, or partners outside India for the purposes described in this Privacy Policy. All such transfers will be subject to appropriate safeguards, including contractual, organizational, and technical measures, to ensure that your personal data continues to be protected in accordance with the DPDP Act and applicable laws. By using our Services, you consent to such transfers, and we ensure that your rights under the DPDP Act remain enforceable even when your Personal Data is processed internationally.

## **11. THIRD-PARTY WEBSITES, CONTENT & INTEGRATIONS**

The Site may contain links to third-party websites, applications, or integrations, over which we have no control. We are not responsible for their privacy practices or content, and we encourage you to review their privacy policies before interacting with them. If you choose to connect third-party integrations or social logins, you consent to share relevant data with those third parties, and we are not responsible for their actions or omissions.

## **12. CHANGES TO PRIVACY POLICY**

We may update this Privacy Policy periodically to reflect changes in data practices, legal requirements, or business operations. Significant changes will be communicated via the Site, and where required, renewed consent may be sought. Continued use of the Site or Services after updates constitutes acceptance of the updated Privacy Policy.

## **13. GRIEVANCE OFFICER & CONTACT INFORMATION**

- 13.1. If you have any questions, wish to exercise your rights, or file a grievance, you may contact our Grievance Officer at Mangesh Naukarkar, email [contact@4esoftware.com](mailto:contact@4esoftware.com), or at our registered corporate office 4ESoftware Private Limited, Kalpataru Regency Phase 2, Kalyani Nagar, Pune 411006.
- 13.2. Our Grievance Officer will respond to all requests within 30 days of receipt, unless otherwise notified. We are committed to addressing privacy concerns in a timely and appropriate manner.

## **14. CONSENT & WITHDRAWAL**

By using the Site or Services and providing your Personal Data, you consent to the practices described in this Privacy Policy. Where processing is based on consent, you may withdraw it at any time by contacting our Grievance Officer or using any consent management mechanism we implement. Withdrawal of consent will not affect processing based on other lawful grounds.

## **15. GENERAL**

This Privacy Policy, together with any applicable Terms of Service or other agreements between you and Caizin, constitute the complete understanding with respect to our privacy practices. In the event of any inconsistency between this Privacy Policy and any other agreement, this Privacy Policy shall govern in respect of personal data protection. If any provision of this Privacy Policy is held invalid or unenforceable under applicable law, the remaining provisions will continue in full force and effect.