

PRIVACY POLICY

Thank you for visiting <https://cbr.exchange>. M/s. CBREX Technologies Private Limited (“**us**”, “**we**”, “**Company**” or “**CBREX**” is the author and publisher of the internet resource *cbr.exchange* (“**Online Platform**” or “**Website**”) on the World Wide Web as well as the software and applications provided by *cbr.exchange*, including but not limited to the software and applications on the Website.

We provide employment opportunities to people looking for jobs (“**Candidate/s**”) whose credentials and other personal details are shared on this Website by our candidate sourcing vendors (“**Suppliers**”) for the benefit of various employers who have an arrangement with CBREX (“**Corporates**”). For the purposes of this policy, “**user(s)**” or “**you**” refers to the Suppliers, Candidate(s) and Corporates, as the case maybe.

We respect the privacy of everyone who visits this Website. The confidentiality and protection of your personal information is important to us. This Privacy Policy tells you how we process and use personal information shared by you either directly with CBREX or through a Supplier. Please read this Privacy Policy before using the Website or submitting any sensitive personal information or data.

All rights are reserved by the Company. The content, code and applications contained on this Website, under the domain ***cbr.exchange*** are copyright protected. Website visitors may not reproduce, copy, or redistribute content or code in any form without prior written permission from the Company except for purely personal and non-commercial uses as per the Terms of Use displayed on the Website.

By submitting data to us through this Website or through a Supplier or upon signing up *https://cbr.exchange's* Client Information Sheet, you are accepting this Privacy Policy.

CHAPTER I

Telephone Contact

Notwithstanding yours or the Candidates’ registration with ‘do not disturb’ or ‘do not call’ services, by sharing your or their telephone contact number on the Online Platform you are authorizing CBREX, its representatives, its business partners, Corporates and their representatives, to get in touch with you and/or the Candidate by giving you/ them a recruitment call and invite you/them to participate in the hiring process.

Collection of Information

CBREX, its officers, employees and agents (if appointed), through the Online Platform, are required to collect certain information (which may include sensitive personal information) with regard to the Candidate(s) from you to assist us in our relationship with you. In this regard, you agree and accept that you have complete authority and have obtained all consents from the data owner with regard to sharing the required data of the data owner with CBREX and Corporates, as the case maybe.

If you are unable to provide the information we need, we may not be able to provide you with the job opportunities or services you have requested. The types of information collected can include:

1) Personal Information

- (a) At times we may request that you supply us with personal information belonging to the Candidates. Generally this information is requested when you want us to

provide you with information or a service. We may require you to share the following information of the Candidates:

- Name
 - Address
 - Email address
 - Mobile phone number/ telephone number
 - Date of birth
 - Gender
 - Qualifications
 - Educational credentials
 - Government assigned identifications, including Permanent Account Number/Passport Number/Voter ID Number and Social Security Number
 - Current profession/employment
 - Name and type of entity
 - Residential status
 - Name of the current employer
 - Net take home Salary
 - Total work experience
 - Experience in current employment
 - Employment credentials
 - Additional Qualifications
 - Details of prior employment or application attempts with the same Company or its affiliates
 - IP address, a unique identifier for your computer, cellular phones, tablets or such other device (“**Devices**”)
 - Address of place where your documents may be collected
 - Information which would help the Online Platform to determine the Candidates’ eligibility to avail the jobs offered
 - Information which helps the Online Platform to process applications made by you for particular services and job opportunities such as resume, qualification certificates, offer letter from current employment, salary slip
 - Any personal information you or the Candidate may provide us during any telephonic conversation or e-mail communication with our representatives
 - Any other information that the Online Platform is required to collect.
- (b) Information that is freely available in the public domain or accessible under the Right to Information Act, 2005 or any other law will not be regarded as personal information or sensitive personal data or information.

2) Non-personal information

- (a) At this Website, information sent by your web browser, may be automatically collected. This information typically includes the domain name (the site after the @ in your e-mail address). It may also contain your user name (the name before the @ in your e-mail address). Other examples of information collected by our server include the Internet Protocol (IP) address used to connect the visitor's computer to the Internet, operating system and platform, the average time spent on our Website, pages viewed, information searched for, access times, websites or applications visited before and after a visitor visits our Website, and other relevant statistics. The amount of information sent depends on the settings you have on your web browser. Please refer to your browser if you want to learn what information it sends;
- (b) All such information will be used to assist us in providing an effective service on this Website. We may from time to time supply the owners or operators of third party websites from which it is possible to link to our Website with information relating to the number of users linking to our Website from such third party websites;
- (c) We also use the information which we automatically receive from your web browser to see which pages you visit within our Website, which websites you visited before coming to ours, and where you go after you leave. This is helpful to understand how our visitors use this Website. We use this information in the aggregate to measure the use of our Website and to administer and improve our Website. This statistical data is interpreted by the Company in its continuing effort to present the Website content that visitors are seeking in a format they find most helpful;
- (d) When you use a Device to access our Website, we may access, collect, monitor, store on your Device, and/or remotely store one or more "device identifiers." Device identifiers are small data files or similar data structures stored on or associated with your Device, which uniquely identify your Device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by us; and
- (e) A Device identifier may deliver information to us or to a third-party partner about how you browse and use the service and may help us or others provide reports or personalized content and ads. Some features of the Website may not function properly if use or availability of device identifiers is impaired or disabled.

3) Use of your information

- (a) We collect and use your personal information in order:
 - (i) to provide information or interactive services through this Website to your e-mail address;
 - (ii) to respond to the requests submitted by you to the Suppliers for the purposes of recruitment and sharing your information with various Corporates and other third parties, in relation to any of our services or any other information sought by you either directly from us or through the Suppliers;
 - (iii) to contact you in relation to any of our services offered on our Website;
 - (iv) to process applications submitted by you through the online process available on this Website, to avail any of the services provided by us;

- (v) to improve our business operations and to communicate about our services and businesses;
 - (vi) to provide information regarding our services and this Online Platform, to your e-mail address or, where you wish it to be sent by post, to your name and postal address, to seek your feedback or to contact you in relation to those services offered on our Website; and
 - (vii) to process your requests on the Online Platform and any possible later claims, to meet out our obligations in relation to any agreement you have with us, to resolve problems in relation to any services supplied to you, to create services that may compliment your needs.
- (b) By using this Online Platform for the purpose, you are voluntarily releasing information to us and you have complete authority and all requisite consents to release such information. Your e-mail address will be used by the Company to respond to you.
- (c) In addition, we may have collected similar information from you in the past. By entering this Website you are consenting to the terms of our information Privacy Policy and to our continued use of previously collected information. By submitting your personal information and the personal information belonging to the Candidate(s) to us, you will be treated as having given the necessary permission for the processing and using of such personal data as set out in this policy.
- (d) We may also send you other information about us, our Online Platform, our newsletters, job promotions, our other Website and applications, SMS and e-mail alerts, anything relating to other companies in our group or our business partners. If you would prefer not to receive any of this additional information you may click the “unsubscribe” link in any email that we send to you or by sending an email at **unsubscribe@cbr.exchange**. Kindly note that unsubscribing from one medium does not automatically lead to unsubscription from the other. We endeavor that within 5 (five) working days of receipt of your instruction, to cease to send you information as requested. If your instruction is unclear we may contact you for further information.
- (e) All the information provided to this Online Platform by you, including sensitive personal information belonging to you or to the Candidate(s), is voluntary and consented. You understand that we may use certain information, which has been designated as ‘sensitive personal data or information’, (a) for the purpose of providing you the Services, (b) for commercial purposes and in an aggregated or non- personally identifiable form for research, statistical analysis and business intelligence purposes, (c) for sale or transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. This Online Platform also reserves the right to use information provided by or about the end-user for the following purposes:
- (i) Contacting the users for offering new services;
 - (ii) Contacting the users for taking service feedback;
 - (iii) Publishing such information on the Website, including but not limited to, by way of testimonials, etc.; and
 - (iv) Analyzing anonymized practice information for commercial use.
- (f) In addition to the terms of this Privacy Policy, this section applies to all users registered with this Website:
- (i) As part of the registration as well as the job application creation and submission process that is available to the users on the Online Platform,

certain information, including sensitive personal data or information is collected from the users (including sensitive personal information belonging to the Candidate(s) through the Suppliers) with their consent and may be shared with our business partners and Corporates;

- (ii) All the statements in this Privacy Policy apply to all users, and all users are therefore required to read and understand this policy set out herein prior to submitting any sensitive personal data or information to the Website, failing which they are required to leave our Online Platform immediately;
- (iii) Users' personally identifiable information, which they choose to provide to the Website (either directly or indirectly) , is used to help the users describe and identify themselves. This information is exclusively owned by the Website. The Website may use such information for commercial purposes and in an aggregated or non- personally identifiable form for research, statistical analysis and business intelligence purposes, and may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates;
- (iv) Users are aware and consent that their information may be shared with our business partners and Corporates for the purpose of assisting them with the recruitment process;
- (v) Any personally identifiable information of the users collected through the Online Platform is not generated by the Website and is provided to the Website by the Suppliers or Candidates themselves who wish to avail job opportunities using the services available on our Online Platform. The Website has the right to transfer this information to the intended end client on an AS-IS basis making no representation or warranty on the accuracy or completeness of the information;
- (vi) The Website makes every effort to capture accurate information from the users. However, the Website does not undertake any liability for any incorrect or incomplete information provided to its *business partners, affiliates, and Corporates*;
- (vii) The Website will communicate with the users through email, phone and notices posted on the Website or through other means available through the service, including text and other forms of messaging.
- (viii) The Website may keep records of electronic communications and telephone calls received and made in relation to the services or other purposes for the purpose of administration of our services, customer support, research and development;
- (ix) All our employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every users' sensitive personal data and information;
- (x) The Website may also disclose or transfer users' personal and other information a user provides, to a third party as part of reorganization or a sale of the assets of CBREX. Any third party to which CBREX transfers or sells its assets to, will have the right to continue to use the personal and other information that users provide to us, in accordance with the Terms of Use;
- (xi) To the extent necessary to provide users with the services, the Website may provide their personal information to third party contractors who work on behalf of or with the Online Platform to provide users with such services, to

help the Online Platform to communicate with users or to maintain the Website. Generally, these contractors do not have any independent right to share this information, however certain contractors who provide services on the Website, including the providers of online communications services, will have rights to use and disclose the personal information collected in connection with the provision of these Services in accordance with their own privacy policies; and

- (xii) The Website will not sell/share your personally identifiable information or the personally identifiable information belonging to the Candidate(s) with any third party save and except in accordance with the terms of contained herein.

4) Commitment to Information Security

We take appropriate measures to ensure that your information disclosed to us is kept secure, accurate and up to date. This site has reasonable security measures in place to protect the loss, misuse and alteration of the information under our control. We utilize firewalls, SSL encryption technologies, and secured server and authentication procedures for security purposes for our website.

Unauthorized attempts to upload or change information (or otherwise cause damage to this Website) are strictly prohibited. However, we assume no liability for any disclosure of information due to any errors in transmission, unauthorized third party access to our website and data bases or other acts of third parties, or acts or omissions beyond our reasonable control. In the event this Online Platform becomes aware of any security breach, we will notify you as soon as possible and take appropriate action to the best of our ability to remedy such a breach.

5) Links to Third Party Websites

- (a) This Website contains links to sites outside <https://cbr.exchange>. The Company is not responsible for the privacy practices, the content, the authentic nature or safety of such other websites; and
- (b) Our Website links to third party sites which we do not operate or endorse. These websites may use cookies and collect your personal or non-personal information in accordance with their own privacy policies. This Privacy Policy does not apply to third party websites and we are not responsible in any manner for third party websites.

6) Sharing your information with third parties

- (a) We may pass your Personal Information and/or the Personal Information pertaining to the Candidate(s) shared by you including name and address on to a third party for the purposes of assisting in the recruitment process;
- (b) We may also share your data with our affiliates or agents or Corporates and their representatives for providing services through the Website. You further authorize the affiliates or agents Corporates and their representatives to use this information to provide services to you, directly or indirectly;
- (c) We may also use your data or the data belonging to the Candidate(s) shared by you in order to manage this Website, enable you to subsequently access parts of this Website, detect any fraud or abuses, send you information relevant to the Website or our services, and in case we have any queries;
- (d) We may disclose your information or the data belonging to the Candidate(s) to service providers under contract who help with our business operations and

- services offered on the Website (such as, but not limited to, document collection services, user verification service providers, etc.);
- (e) We may also disclose your information or the data belonging to the Candidate(s) to respond to legal requirements, enforce our policies, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with the applicable laws and regulations;
 - (f) We may also share your information or the data belonging to the Candidate(s) with law enforcement, governmental agencies, or authorized third-parties, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity that may expose us, you, or any other stakeholder of the company to legal liability. We may also disclose the same if: (i) required to do so under any law for time being in force, or required to do so under any order, decree or award passed by any Court, Tribunal or any statutory authority; (ii) trying to protect against the occurrence of, or prevent actual or potential, any fraud, hacking, malware attack or unauthorized transactions or for investigating any of the aforesaid activity which has already taken place;
 - (g) We may also share your information or the data belonging to the Candidate(s) with other business entities, should we undergo any corporate restructuring including any plan to merge with or be acquired by that business entity or start a joint venture. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to the said information);
 - (h) You must only submit to us or our agent or the Website information which is accurate and not misleading and you must inform us of any changes; and
 - (i) Under no circumstances do we rent, trade or share your personal information or the data belonging to the Candidate(s) that we have collected with any other company for their marketing purposes without your consent. We reserve the right to communicate your personal information to any third party that makes a legally-compliant request for its disclosure.

7) How long do we keep your information?

We will only keep your information for as long as we are either required to by law or as is relevant for the purposes for which it was collected, or in an anonymized format for analytical learning to improve the quality of service provided to the various stakeholders.

8) Information placed on your computer - Cookies

- (a) We may store some information such as cookies on your Device when you access our Website. Cookies are text files containing small amounts of information which we download onto your Device when you visit our Website and App for record-keeping purposes. We can recognize these cookies on subsequent visits and they allow us to remember you.
- (b) A few important things you should know about our use of Cookies:
 - (i) We use both session and persistent Cookies. Session Cookies expire and no longer have any effect when you close your browser. Persistent Cookies remain on your device until you erase them or they expire;
 - (ii) You are always free to decline Cookies if your web browser permits, although doing so may interfere with your use of our Website. Refer to the help section of your

- browser, browser extensions, or installed applications for instructions on blocking, deleting, or disabling Cookies;
- (iii) We encode and protect our Cookies so that only we can interpret the information stored in them;
 - (iv) You may encounter Cookies from third parties, known as service providers, that we have allowed on our site that assist us with various aspects of our web site operations and services; and
 - (v) If you want to find out more information about cookies, go to <http://www.allaboutcookies.org> or to find out about removing them from your browser, go to <http://www.allaboutcookies.org/manage-cookies/index.html>.

9) Children's and Minor's Privacy

[Name of the website] strongly encourages parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission.

10) Indemnity

The users are aware and acknowledge that all personal information and data pertaining to the candidates have been obtained by the Supplier with the respective candidates' consent and in accordance with law. Further, the Supplier has represented to CBREX and the Online Platform that the Supplier has complete authority and has obtained all necessary consents from the candidate to share all data and personal information belonging to the candidate with the Online Platform. In the event, there is any breach of privacy of the candidate or any applicable law, CBREX shall not be responsible or liable for the same and the sole liability in this regard will be on the Supplier.

11) Changes to this Privacy Policy

We reserve the right, at our discretion, to change, alter, modify, add, or remove portions from this Privacy Policy at any time so you are encouraged to review this Privacy Policy from time to time.

12) Contacting us

Questions, comments and requests regarding this Privacy Policy should be addressed to **support@cbr.exchange**. You may also contact us on: **+919867294980 (Monday-Friday, 9am to 5 pm India Standard Time)**.

CHAPTER II

Apart from the aforementioned terms, the terms contained under this Chapter II are applicable exclusively to the users who are residents of any EU countries.

1) Who are we?

We are in charge of storage and processing of the data/ personal information belonging to the Candidates that has been collected and shared with us by the Suppliers in accordance with applicable laws and with the prior consent of the Candidates, for the purposes of assisting the Corporates with their job requirements.

2) Data Subject Rights:

As per the Chapter 3 of the EU General Data Protection Regulation (GDPR), each Data Subject has eight rights. These are:

- (a) The right to be informed; this means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
- (b) The right of access; this is your right to see what data is held about you by a Data Controller i.e., the Supplier.
- (c) The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.
- (d) The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
- (e) The right to restrict processing; this gives the Candidate the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
- (f) The right to data portability; the Candidate has the right to ask for any data supplied directly to the Supplier by him or her, to be provided in a structured, commonly used, and machine-readable format.
- (g) The right to object; the Candidate has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
- (h) Rights in relation to automated decision making and profiling; the Candidate have the right not to be subject to a decision based solely on automated processing.

3) Transferring data internationally

In order to provide our services, we may need to transfer your information from your country of residence to another country in the usual course of our business. By dealing with us and submitting your personal information, you agree to the transfer, storage, and/or processing of your personal information outside of your country of residence as set out above.