

1. Introduction to New Way Work Force's privacy policy

New Way Work Force is committed to protecting the privacy of individuals and this policy details our commitment to protecting the privacy of individuals, who:

- i. Visit our website (www.newwayworkforce.com) (herein afterreferred to as “website visitors”) or individuals, who request us to contact them via our online webforms;
- ii. Register to use the products and services which we market for subscription available at our website or are our customers using our products & services that include their business leads, candidates’ data & site visitors (hereinafter referred to as “services”);
- iii. Attend or register to attend webinars, sponsored conferences or other events at which New Way Work Force participate (hereinafter referred to as “attendees”); or
- iv. Apply for the jobs that are posted by New Way Work Force (to be hired by New Way Work Force) on our website or through other process (hereinafter referred as “applicants”) This policy describes how New Way Work Force collects, uses, shares and secures the personal information that you provide. It also describes your choices regarding use, access and correction of doorperson information.
- v. Disclosure: We use Google's restricted API scopes for our Gmail Add-on to read incoming emails and import file attachments to our application for job processing. The New Way Work Force application's use and transfer to any other app information received from Google APIs will adhere to Google API Services User Data Policy, including the limited use requirements.”

2. Personal data that may be collected

We are broadly identifying three categories of individuals, who could be sharing their personal or other data as referred in this section. By Subscribing to our system or writing to us using our online forms along with the details sought or through emails, you hereby provide your consent to us to use the data or details sought from you for any of the purpose listed below, however, you can opt-out by any of the process defined in this document elsewhere.

- a. Website visitors & attendees of webinars: The following categories of data could be collected:

Personal data: Included in this category are classes of data which identify an individual and their personal characteristics. A few examples of this are name, addresses, job title, company name, business type, size of the company & contact details.

- b. Services & applicants: New Way Work Force provides a CRM, Recruitment & Onboarding platform to its customers and also uses these platforms for its own hiring purpose. The data that could be collected could contain followings:

Personal data: Included in this category are classes of data which identify an individual and their personal characteristics. A few examples are names, addresses, job title, company name, business type, size of the company, contact detail, employer, age, sex, languages known, date of birth, physical descriptions, identifiers issued by public bodies, like social security numbers (SSN) of a country and NI numbers. Some

of the customers may also seek data that pertains onboarding of the candidates / applicants like family details, references including their contact & other personal details.

Education details: Included in this category are details that relates to the education and professional training or certification of an individual. Some of the examples are academic records, qualifications, skills, training records, year of passing, qualification marks and professional expertise.

Employment information: Included in this category are details relating to the employment of an individual. Some of the examples are business role, employment and career history, career duration, recruitment and termination details, attendance record, health and safety records, performance appraisals, training records, agency employer, security records or other information necessary to determine an individual's fitness for employment. Some of the data may also include the medical test fitness data of candidate.

Financial details: Included in this category are details relating to the financial affairs of an individual. Some of the examples are income, salary, billing rate, payments, benefits, bank or other information necessary to process payroll for an individual. New Way Work Force and its customers may also be using information such as payment processing information, bank information, and billing address.

Services provided including contracts & agreements: Included in this category are types of data relating to services that are provided by New Way Work Force to its customers such as details of the services supplied, licenses issued, agreements and contracts.

IT information: Included in this category are types of information relating to an individual's use of technology or software including IP addresses, any information about the computing or mobile device an individual is using, location data gathered from such devices, connection data, usernames and passwords, and social media handles.

Other information: Included in this category are classes of data that are considered sensitive data, personally identifiable information, or sensitive personal data under applicable law. This category of personal data is typically collected to comply with legal requirements or to determine fitness for employment.

3. Information that we collect from our website & social media plug-ins

Cookies and other tracking technologies:

New Way Work Force and its authorized partners may use cookies and other information gathering technologies for a variety of purposes. These technologies may provide us with personal information, information about devices, language and networks you utilize to access our websites, and other information regarding your interactions with our websites. We may use web beacons, tags and scripts on our websites or in email or other electronic communications we send to you. These assist us in delivering cookies, counting visits to our websites, understanding usage and campaign effectiveness and determining whether an email has been opened and acted upon. We may receive reports based on the use of these technologies by our third-party service providers on an individual and aggregated basis. We use local storage such as HTML5 and local shared objects ("LSOs," also known as flash cookies) to store content information and preferences. Various browsers may offer their own management tools for removing HTML5. Third parties with whom we partner to provide certain features on our websites or to display advertising based upon your web browsing activity use HTML5 and flash to collect and store

information. For further information on how to manage flash cookies, please click [here](#). We Partner with third parties to either display advertising on the websites or to manage our advertising on other sites. Our third party partners may also use technologies such as cookies, web beacons, tags, flash, HTML5, scripts, or other tracking technologies to gather information about your activities on our websites and other sites in order to suggest advertisements based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) and [here](#). If you are located in the European Union you may opt into the use of cookies by clicking [here](#). Please note this does not opt you out of being served ads and you will continue to receive generic, untargeted ads. Our site may offer publicly accessible blogs or community forums. Any information you provide in these areas may be read, collected, and used by others who could be accessing them. To request removal of your personal data from our blog or community forum, contact us at **[Insert Email Id]**. There could be situation where we may not be able to remove your data and we will let you know about those situations and why we are not able to remove your data, if the case be. Alternatively, if you used a third-party application to post such information, you can remove it, either by logging into the application and removing the information, or by contacting the appropriate third party application. For your information, we are listing different types of possible cookies:

Essential cookies: These are strictly necessary cookies and are required for the operation of the site as without them we cannot provide many services that you need on the website. For example, essential cookies help remember your preferences as you move around the website.

Session cookies: These cookies contain encrypted information to allow the system to uniquely identify you while you are logged in. Session cookies exist only during an online session. They disappear from your computer when you close your browser software or turn off your computer. This information allows us to process your transactions and requests. Session cookies help us make sure you are who you say you are after you've logged in and are required to use our applications.

Functionality or preference cookies: During your visit to the websites, cookies are used to remember information you have entered or choices you make (such as your username, language or your region) on the websites. They also store your preferences when personalizing the websites to optimize your use of our application, for example, your preferred language. These preferences are remembered, through the use of persistent cookies, and the next time you visit the websites you will not have to set them again.

Analytics cookies: These cookies track information about visits to the websites so that we can make improvements and report our performance. For example: analyze visitor and user behavior so as to provide more relevant content or suggest certain activities. They collect information about how visitors use the websites, which site the user came from, the number of each user's visits and how long a user stays on the websites. We might also use analytics cookies to test new ads, pages, or features to see how users react to them.

Targeting or advertising cookies: These first party cookies are placed by third party advertising platforms or networks in order to deliver ads and track ad performance, enable advertising networks to deliver ads that may be relevant to you based upon your activities (this is sometimes called "behavioral" "tracking" or "targeted" advertising) on the websites. They may subsequently use information about your visit to target you with advertising that you may be interested in, on the websites and other websites. For example, these cookies remember which browsers have visited the websites. We provide a few website

plugins, and in similar way, those plug ins could be using the cookies and have some inbuilt functionality to access data through plug in. For example, we provide plug-in for Google Chrome; Gmail, etc.

4. Information collected from other sources

Social media: The websites include social media features and widgets. These features may collect your Internet protocol address, which page you are visiting on the websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the websites. Your interactions with these features are governed by the privacy statement of the companies that provide them.

Information from services provided by third parties: We may also obtain other information, including personal information, from third parties and combine that with information we collect through our websites. For example, we may have access to certain information from a third party social media or authentication service if you log into our services through such a service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third party social media or authentication service is in accordance with the authorization procedures determined by that service. If you authorize us to connect with a third party service or using our interface to connect with any third party, we will access and store your name, email address (es), current city, profile picture URL, and any other personal information that the third party service makes available to us, and use and disclose it in accordance with this policy. You should check your privacy settings on these third party services to understand and change the information sent to us through these services. For example, you may choose to log in to the services using single sign-in services. These single sign-on services will authenticate your identity, provide you with the option to share certain personal information (such as your name and email address) with us, and pre-populate our sign-up form. services like Facebook Connect give you the option to post information about your activities in the services to your profile page to share with others within your network.

5. Scope

This section defines the scope of the policy, when it applies:

1. Website visitors
2. Attendees
3. Applicants

The policy does not apply in the below cases:

Third party websites: Our websites may contain links to other websites or integrated with other websites or we might have built an interface to link other websites. The information practices and the content of such other websites are governed by the privacy statements of such other websites. We encourage you to review the privacy statements of any such other websites to understand their information practices and usage policy.

“Services” data (customer data):

With the exception of your account information we have as website visitor and/or attendees or New Work Force’s applicant as referred in clause 1 (i) (iii) (iv) of this document (as defined below) and other information we collect in connection with your registration or authentication into our services, this policy does not apply to our security and privacy practices in connection with electronic data, text, messages, communications or other materials submitted to and stored within the services by you (“service data”). Service data security and privacy practices are detailed in and governed by our End User License Agreement that we sign up or share with our customers, or such other applicable agreement between you and our organization relating to your access to and your use of such services (collectively referred to as the “service agreement”).

Subscribers to our services (our customers & their users) are solely responsible for establishing policies for, and ensuring compliance with, all applicable laws and regulations, as well as any and all privacy policies, agreements or other obligations, relating to the collection of personal information in connection with the use of our services by individuals (also referred to as “data subjects”) with whom our subscribers interact.

We collect information under the direction of our subscribers (customers), and have no direct relationship with individuals whose personal information we process in connection with our subscriber’s use of our services. The use of information collected through our services shall be limited to the purpose of providing the service for which subscribers have engaged with our organization. If you are an individual who interacts with a subscriber using our services (such as a customer or user of one of our subscribers) and require assistance or would either like to amend you contact information or no longer wish to be contacted by one of our subscribers that use our services, please contact the subscriber that you interact with directly.

Also, New Way Work Force is not liable for any non-compliance done by our subscribers (customer or their users) pertaining to data privacy or any other regulations in this regard.

6. Usage of information we collect from you:

a. General use: We may use the information we collect about you (including personal information, to the extent applicable) in order to perform our obligations under our service agreement with you and on the basis of our legitimate interest including to

(a) Provide, operate, maintain, improve, and promote the websites and the services;

(b) Enable you to access and use the websites and the services;

(c) Process and complete transactions and send you related information, including purchase confirmations and invoices;

- (d) Send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages;
- (e) Send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners (you can opt-out of receiving marketing communications by providing the names/email address(es) that you would like removed from our marketing databases and added to our 'Do Not Contact' list or following the unsubscribe instructions included in our marketing communications);
- (f) Process and deliver contest or sweepstakes entries and rewards;
- (g) Monitor and analyze trends, usage, and activities in connection with the websites and services to keep you apprised of new features and new products we launch or offer;
- (h) Investigate and prevent fraudulent transactions, unauthorized access to the websites and the services, and other illegal activities;
- (i) Personalize the websites and services, including by providing new features, modules or updates that match your requirements and preferences; and
- (j) For other purposes for which we obtain your consent.

b. Legal basis for processing (EEA visitors only): If you are a visitor from the European Economic Area ("EEA"), our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we need the personal information to perform a contract with you (e.g. to provide you with our services), where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time why we need to use your personal information. If we process personal information in reliance on your consent, you may withdraw your consent at any time. If you have questions about, or need further information concerning, the legal basis on which we collect and use your personal information, please write to us at **[Insert Email Id]**.

7. Access to your personal data

a. Access to your personal data received & managed by New Way Work Force Referring to clause 1 (i), (iii) & (iv), any data received by New Way Work Force is accessed by its employees or authorized representative on need to know basis only and used for the purpose the data is provided or consent is opted from you. All the employees or associates/ partners of the company are governed with internal access management policy of the data and are governed by confidential agreement we execute with them.

b. Access to your personal data controlled by New Way Work Force Upon request and within 15 days, or as agreed with the customers agreement or as otherwise required by applicable law, New Way Work Force will provide you with information about whether we hold, or process on behalf of a third party, any of your personal data. In addition, New Way Work Force will take all reasonable measures to permit customers to correct, amend, delete, or receive a copy of their personal data. To request this access, please contact **[Insert Email Id]**. In accordance with customer agreements, we will, upon request, provide our customers with a copy of their personal data stored by us upon expiration or termination of the customer agreements as per terms of the agreement, unless applicable law determines otherwise.

c. Access to your personal data controlled by customers You have the right to access your personal data and to withdraw consent to the use/processing of your personal data. In most cases, New Way Work Force has no direct relationship with the individuals whose personal data it processes for customers. We recommend that an individual who seeks access, or who seeks to correct, amend, delete or receive a copy of personal data should direct his/her query to our customer (the data controller).

If requested to remove data by our customer, we will respond within 30 days or as otherwise required by applicable law.

8. Sharing of information collected:

Third party service providers

We share information, including personal information, with our third-party service providers that we use to provide hosting for and maintenance of our websites, applications, backup, storage, analytics and other services for us. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

We may also share aggregated and/or anonymized information regarding your use of the services with third parties for marketing purposes based on our legitimate interest to develop and promote service(s). However, we would never identify you, your agents or end-users as the source of the information.

We may collect, and we may engage third-party analytics providers to collect, metrics and information regarding your use of the service, including evaluating how agents and end-users use the service (“usage data”), to develop new features, improve existing features or inform sales and marketing strategies, based on our legitimate interest to improve the services. When we process usage data, any personal information shall be anonymized. Any such third-party analytics providers will not share or otherwise disclose usage data, although we may make usage data publicly available from time to time.

Compliance with laws and law enforcement requests; protection of our rights:

In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our service agreement, or as otherwise required by law.

Testimonials:

From time to time, we may post testimonials on the websites that may contain personal information. We take your approval before posting your testimonials on our website or our marketing & other communications. We always obtain your consent to post your name along with your testimonial. If you wish to update or delete your testimonial, you can contact us at **[Insert Email Id]**.

To market our services:

If you have requested for a demo in a geography, we may share your info to a partner in that geography to connect with you to connect with you for any discussion and demonstration of our solution. Each partner is governed with our partnership agreement and confidentiality agreement to protect your data. We may share information, including personal information, with our channel partners, solely for the purpose of enabling our channel partners to notify you about our services. New Way Work Force requires its channel partners to provide an opt-out option within its communications to you. By opting out, you are opting out of receiving future communication from our channel partner.

With your consent:

We may also share personal information with third parties when we have your consent to do so.

9. Opt out

You have option to control the use of cookies at the individual browser level, you use. We provide option to reject cookies. If you reject cookies, you may still use our site, but your ability to use some features or functionality of our site may be limited. Nowadays, most of the browsers allow a private or incognito (In case of Chrome Browser) mode to be activated through which the cookies are always erased after the visit. Each major browser has this facility in different names as referred below :

Browser Name & Versions	Private Window Name
Google Chrome 30 & later versions	Incognito
IE 11 & Later versions	In Private
Safari 7 & Later versions	Private Navigation
Mozilla Firefox 27 & later versions	Private Navigation
Opera 17 & later versions	Private Navigation

As mentioned in clause 1 (i), (iii) & (iv) in this policy document, New Way Work Force has implemented GDPR (General Data Protection Regulations) guidelines to seek consent for any visitor, prospect, applicant, etc. from EU region and data will be retained as per retention policy referred in this document.

The applicants are provided the option to revoke their consent from candidate career portal, if they have logged in. Similarly, if our team are approaching any such individuals, they will mention in their communication seeking their consent for specific period and for specific purpose. The individuals, who desires to opt-out from the marketing communications, can simply click to unsubscribe from receiving such marketing campaign mails. Also, they can write at **[Insert Email Id]** to opt-out for revocation of the consent & deletion of their data from our database.

Our customers using our applications may have their own Data privacy policies specific to the region they work. If you wish to get any info about your data or wishes to opt out, you will have to communicate to them directly. For any help, you can, however, reach out to us at **[Insert Email Id]**.

10. Data retention data retention by New Way Work Force

As mentioned in clause 1(i), (iii) & (iv) in this policy document, New Way Work Force has implemented GDPR (General Data Protection Regulations) guidelines to seek consent for any visitor, prospect, applicant, etc. from EU region and other regions than India, data will be retained for 3 years from date of their consent, until consent is revoked by the individual. Post three years, there will be auto email to extend your consent will be sent for further period of three years along with the purpose for which the data will be used. In the event we cannot delete your personal data or render it unusable, we will inform you of the reasons, subject to any legal compulsions or restrictions.

Customer data

We will retain personal data of a customer as long as a customer's account is active or as needed to provide the service to our customer, as per under our End Users License Agreement, we will hand over the data of our customers once they discontinue our services and delete from our servers their data forever. Each of our customer may have a different data retention policy which you will hear from them only. You may connect to them only for any info in this regard you may seek.

Data retention under a court order

As per data retention policy, we may hold your data to be retained if we have any court order in place, in such situation, we will communicate with you about such situation.

11. Data security

Adequate and reasonable security measures are taken by New Way Work Force to protect the personal data against the loss, misuse, and alteration it processes. We use Transport Layer Security (TLS) technology that protects information using both server authentication and data encryption to ensure personal data is safe, and secure while in transit. From application front, New Way Work Force provides strong configurable process for application signing and password protection including use of captcha post number of configurable failed attempts. These strong measures and safeguards help protect against unauthorized access, maintain data accuracy, and provide for the appropriate use of personal data. As you may know that no method of transmission over the Internet, or method of electronic storage, is 100 percent secure, however, no one can guarantee any absolute security so are we. Should you have any query with respect to data security, please reach out to us at **[Insert Email Id]**.

Also, we take data back up as per the End User License Agreement (EULA) signed with our customers. As a general practice, we take regular back of customer data in different geographical location to protect data loss in case of an uneventful reason. The entire data is securely transmitted in encrypted form as referred above. However, based on customer's requirement and agreement we enter, the back-up are / can be taken in same geographical location but in different data center. Also, we have all necessary agreement and security guidelines in place with our cloud service provider.

12. Minors' personal information

New Way Work Force does not knowingly collect any personal information from children under the age of 16. If you are under the age of 16, please do not submit any personal information through our websites or services. We will advise parents and legal guardians to monitor their children's Internet usage and to help enforce this policy by instructing their children never to provide personal information through the websites or services without their permission.

Our New Work Force application has configurable provision to restrict applicants below a certain age so that they cannot apply for any job from our customers. Our customers are also advised to not to take up personal information.

If you have reason to believe that a child under the age of 16 has provided personal information to us through the websites or services, please contact us at **[Insert Email Id]**.

13. Severability, waiver and jurisdiction

In the event that any provision of this policy shall be unenforceable or invalid under any applicable law or court decision, such unenforceability or invalidity shall not render this policy unenforceable or invalid as a whole and, in such event, any such provision shall be changed and interpreted so as to best accomplish the objectives of such unenforceable or intended provision within the limits of applicable law or applicable court decisions.

These terms constitute the entire agreement between you and New Way Work Force, and supersede all prior communications or terms, whether electronic, oral or written, between you and us. Failure by us to enforce these terms shall not be construed as a waiver. These terms and your use of the site shall be governed by Indian law.

14. Amendment in this privacy policy

We may time to time change the policy based on the requirement and our users/subscribers are advised to visit this page from time to time.

15. GDPR

New Way Work Force builds great trust with its customers ensuring security and integrity of their data. We take all appropriate measures to keep their data safe and secured. Our customers maintain control of their data to keep it safe and secured in various ways:

Date security:

We maintain high security standards being accredited with ISO 27001 and our cloud partners provide third party audit including SOC2 and we have necessary infra that is secured with fireball and other necessary measures to minimize risk of any possible DDos attacks.-

Disclosure of customer data:

We only discloses customer data to third parties where disclosure is necessary to provide the services or as required to respond to lawful requests from public authorities.

Data hosting locality:

Based on customer agreement and purchase of feature to host database locally, the same services are provided and ensured.

Access management:

Our robust internal Access Management Policy ensures access on need to know basis and we use necessary encryption feature to protect the personal data.

GDPR is a data protection framework for the citizens residing in the EU, however, it also applies to all organizations that handle personal data of citizens from the EU. GDPR is applicable to some customers of New Way Work Force, and hence to New Way Work Force as processors.

We have necessary GDPR Framework that enables our customer to comply with the necessary.

The Data Protection Impact Assessment (DPIA) is being carried out to assess the impact of GDPR on New Way Work Force, and the need to put in appropriate measures in place for meeting the regulatory requirements. This DPIA is sponsored by the Managing Director of the company and is being carried out by the DPO. This is also reviewed by an industry expert advisor. The data protection officers can be contacted by email at **[Insert Email Id]**.

New Way Work Force also enables our customers in different region to comply with their respective data privacy regulations prevalent in the countries where they have their operations.

16. Contact Us

Should you have any questions or complaints regarding this policy or about our practices, please contact us by email at **[Insert Email]**, or via post at:

[Insert Address]