

## Privacy Policy

*Last updated on 30-12-2025*

This Privacy Policy ("Policy") explains, in detail and in accordance with the **Digital Personal Data Protection Act, 2023 ("DPDP Act")**, how **alabty** ("alabty", "we", "our", or "us") collects, uses, stores, processes, retains, and deletes personal data when you access or use [www.alabty.com](https://www.alabty.com), its subdomains, applications, dashboards, APIs, and related services (collectively, the "Platform").

This Policy must be read together with the **Terms and Conditions**. Use of the Platform constitutes free, informed, specific, and unambiguous consent to the practices described below.

### 1. Scope, Roles, and Applicability

- This Policy applies to recruitment consultancies, staffing firms, placement agencies, and educational institutions ("Clients" or "Recruiters"), candidates/job seekers ("Data Principals"), and all visitors or users of the Platform.
- Under the DPDP Act, **Clients and Recruiters act as independent Data Fiduciaries** with respect to candidate data uploaded by them.
- **alabty acts as a Data Processor and technology intermediary**, processing personal data strictly on documented instructions of the Client, except where required by law.

### 2. Categories of Personal Data Processed

- **Candidate Personal Data** may include:
  - Identity and contact details such as name, email address, phone number, and location;
  - Professional information including resumes, education history, employment details, skills, certifications, and experience;
  - Screening, interview, assessment, and evaluation data;
  - Call recordings, interview recordings, chat logs, recruiter notes, workflow timelines, and status updates.
- **Recruiter and Client Personal Data** may include:
  - Business details, authorized user information, official contact details;
  - Login credentials, role-based access information, and authentication logs;
  - Subscription, billing, invoicing, and transaction-related information.
- **Technical and Usage Data** may include:
  - IP address, device identifiers, browser and operating system details;
  - Platform access logs, timestamps, audit trails, and security logs;

- Cookies and similar technologies used for session management and analytics.

### 3. Lawful Basis and Consent under DPDP Act, 2023

- Personal data is processed strictly on the basis of:
  - **Explicit consent** provided by the Data Principal;
  - **Contractual necessity** for providing Platform services;
  - **Legal obligations** imposed by applicable Indian law;
  - **Legitimate uses** permitted under the DPDP Act, including security, fraud prevention, and service integrity.
- Recruiters explicitly confirm that **valid candidate consent** has been obtained before uploading or processing any candidate data on alabty.com or its subdomains.

### 4. Purpose Limitation and Use of Personal Data

- Personal data is processed only for clearly defined and lawful purposes, including:
  - Delivery of ATS, recruitment workflow, and campus placement services;
  - Candidate-job matching and opportunity recommendations;
  - AI-assisted screening, assessments, and analytics;
  - Recruitment-related communication between recruiters, employers, and candidates;
  - Platform security, audit, compliance monitoring, billing, and support.
- Personal data is **not sold**, leased, or used for unrelated commercial exploitation.

### 5. Candidate Communication and Consent-Based Outreach

- Subject to valid and lawful consent:
  - alabty may directly communicate relevant job opportunities to candidates where its matching systems identify suitability;
  - Recruiters may contact candidates only for genuine, specific job vacancies;
  - Candidates retain the right to opt out or withdraw consent at any time.
- alabty does not guarantee interviews, job offers, or responses.

### 6. AI Processing and Automated Tools

- The Platform uses AI and automation tools solely for assistive purposes such as parsing, ranking, screening, and workflow optimization.

- AI systems operate under human oversight and **do not take final hiring decisions**.
- Recruiters and employers remain fully responsible for all employment decisions.

## 7. Data Sharing and Disclosure Controls

- Personal data may be shared only:
  - With authorized recruiters or employers for specific recruitment purposes;
  - With vetted service providers acting as sub-processors for infrastructure, communication, or security;
  - Through client-owned third-party APIs integrated using the client's own credentials;
  - When required by law, court order, or regulatory authority.
- Cross-client data access is technically restricted and prohibited without consent.

## 8. External APIs and Third-Party Integrations

- Clients may integrate third-party tools using their own APIs, accounts, and licenses.
- alabty does not control such third-party services and is not responsible for their data handling practices.
- Responsibility for third-party compliance remains with the integrating client.

## 9. Data Security Safeguards

- alabty implements reasonable safeguards as required under the DPDP Act, including:
  - Encryption of data at rest and in transit;
  - Role-based and least-privilege access controls;
  - Continuous monitoring, audit logs, and breach detection mechanisms;
  - Secure hosting and infrastructure practices.
- No system can be guaranteed to be completely secure, and users acknowledge inherent risks.

## 10. Data Retention, Inactivity, and Deletion Policy

- Personal data is retained only for as long as necessary to fulfill the stated purposes or legal obligations.
- **In case a Client account becomes inactive due to payment default, non-renewal, or termination:**
  - All recruiter accounts linked to the Client shall be disabled;

- All client data, recruiter data, candidate profiles, resumes, timelines, workflows, assessments, assessment results, recordings, notes, and communication history **shall be permanently deleted** from the Platform after the applicable grace period;
- Deletion shall be irreversible and includes all backups, logs, and derived datasets, subject to statutory retention requirements.
- alabty shall not be liable for any data loss arising from such deletion due to payment default or prolonged inactivity.

## **11. Rights of Data Principals (Candidates and Users)**

- Subject to applicable law, Data Principals have the right to:
  - Access and review their personal data;
  - Request correction or updating of inaccurate data;
  - Withdraw consent for future processing;
  - Request erasure of personal data where legally permissible;
  - Lodge grievances with alabty's grievance officer.

## **12. Cross-Border Data Transfers**

- Personal data may be processed or stored on servers located outside India where necessary.
- Appropriate safeguards and contractual protections are implemented in accordance with the DPDP Act.

## **13. Children's and Minor Data**

- The Platform is not intended for minors.
- alabty does not knowingly process personal data of children without legally valid consent.

## **14. Compliance, Audits, and Breach Response**

- alabty follows due diligence obligations under the DPDP Act.
- In the event of a personal data breach, alabty shall take reasonable steps to contain, assess, and notify affected parties and authorities where required by law.

## **15. Policy Updates and Amendments**

- This Policy may be updated periodically to reflect legal, regulatory, or operational changes.
- Continued use of the Platform after updates constitutes acceptance of the revised Policy.

## 16. Grievance Redressal and Contact

- For privacy-related queries, rights requests, or complaints:
  - **Email:** [support@alabty.com](mailto:support@alabty.com)
  - **Website:** [www.alabty.com](http://www.alabty.com)

By using the Platform, you acknowledge that you have read, understood, and agreed to this Privacy Policy in compliance with the Digital Personal Data Protection Act, 2023.