

FLEXIPLE PRIVACY POLICY

At Flexiple, we value your trust & respect your privacy. This privacy policy (“**Privacy Policy**”) informs you about the practices for collection, use, disclosure, handling and securing your data (both personal and non personal) through Flexiple.

This Privacy Policy is incorporated within and a part of our [Terms and Conditions](#) (“**Terms**”). Terms capitalised but not defined here will have the meaning assigned to them in the Terms. In some cases, we may provide additional privacy policies specific to certain products, services, practices, or regions. Those terms are to be read in conjunction with this Privacy Policy.

This Privacy Policy applies to all Users of Flexiple. And your use of Flexiple signifies your consent to this Privacy Policy. So, it is important that you read and understand this Privacy Policy before you start using Flexiple. If you do not agree to this Privacy Policy, please do not use or access Flexiple.

We may revise this Privacy Policy as well as update Flexiple from time to time, so please keep visiting this page regularly to take notice of any changes we make.

1 DATA WE COLLECT

1.1 Data you provide us

- 1.1.1 Full name, email ID, address, location or other contact information (including mobile/landline numbers), whether at work or at home, and/ or video conference IDs including Zoom and Skype IDs;
- 1.1.2 If you use Flexiple to make or receive payments, we will also collect certain payment information, such as bank account details, credit card, debit card, electronic wallet or other financial account instrument details, and billing address;
- 1.1.3 Information to verify your identity such as your date of birth and copies of government issued IDs;
- 1.1.4 Information to verify your identity and to detect fraud, identity theft, or other misuse of your account. For this, we may collect a photograph of your face, your gender, a selfie, or data about your interactions with Flexiple including recordings of any audio-visual interactions our representatives have with you;
- 1.1.5 Information about your credentials, employment history, experience and background; and
- 1.1.6 Any information you include in the resume sent to Flexiple.

1.2 Data received from third parties

We also may receive information about you from third parties like Github, LinkedIn, Twitter, Stackoverflow, Bitbucket, Dribbble and Behance among others. For example, we may supplement the information we collect with outside records or at your request from platforms like GitHub. Our service

providers may collect certain data about your visits to and activity on Flexiple as well as other websites or services, they may set and access their own tracking technologies on your device (including cookies and web beacons), and may use that information to show you targeted advertisements. Some of these parties may collect personal information when you visit Flexiple or other online websites and services. If we combine the information we receive from others with information we collect through Flexiple, we will treat the combined information as described in this Privacy Policy.

1.3 Data collected automatically

We and our third party service providers, including analytics and third party content providers, may also collect certain information from your interaction with Flexiple, our services, content and advertising, including, but not limited to, device ID, device type, location, geo-location information, log files, web beacons, timestamps, computer and connection information, usage statistics (such as time spent viewing pages, content you view, number and time spent on visits etc.), traffic to and from Flexiple, ad data, IP address and standard web log information when you visit any of our web pages such as the type of browser you are using (e.g., Chrome, Internet Explorer etc.), the type of operating system you are using, (e.g., Microsoft Windows' or Apple iOS), the domain name of your Internet service provider, the URL or advertisement that referred you to Flexiple, the search terms you entered into a search engine that led you to Flexiple. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. But we may combine this automatically collected information with other information we collect about you.

2 COOKIES

Cookies are small text files that websites often store on computer hard drives or mobile devices of visitors. We do not currently use cookies when you visit Flexiple. But like we discuss above, our service providers may do so. If we use cookies in the future, we will use them solely to provide Flexiple, or to secure, and improve our services. For example, we may use them to keep you logged in, remember your preferences, identify your device for security purposes, analyze your use of our service, compile statistical reports, and provide information for future development of Flexiple. By using Flexiple, you agree that we can place these types of cookies on your computer or device.

3 HOW WE STORE AND SECURE YOUR INFORMATION

- 3.1 We use appropriate technical and organizational security measures to ensure a level of protection for personal information appropriate to the risk:
 - 3.1.1 We maintain a security and authorisation policy for access to our systems and update it from time to time.
 - 3.1.2 The transfer of personal information between your end device and us is generally carried out in an encrypted form over secured HTTPS connection. You can identify an encrypted connection for example by the lock symbol in the address line of your browser.
 - 3.1.3 We maintain strict access controls to prevent unauthorized access to personal information.
 - 3.1.4 If you communicate with us by e-mail, access by third parties cannot be ruled out. In the case of confidential information, we recommend using the physical mail or encrypted e-mail communication (PGP).
 - 3.1.5 All our systems responsible for handling user data are equipped with firewalls to prevent unauthorized access and breach.
- 3.2 However, do note that no method of transmission over the internet, or method of electronic storage is entirely secure and reliable, and we cannot guarantee its absolute security.
- 3.3 In the event that any personal information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

4 USE OF INFORMATION

We use the personal information we collect for the purposes mentioned below:

- 4.1 to manage our relationship with you, to facilitate opening and management of your account and to conclude transactions;
- 4.2 to validate and process your request for the services on Flexiple;
- 4.3 to conduct fraud-detection checks and verify your credentials;
- 4.4 establish communication with you and assist you;
- 4.5 to personalize Flexiple and give you a better user experience on Flexiple;
- 4.6 to help Flexiple identify suitable projects/Freelancers based on your credentials;
- 4.7 to facilitate our internal business operations, including the fulfilment of any legal and regulatory requirements;
- 4.8 to provide you with tailored recommendations about our services, based on your use of Flexiple;
- 4.9 to administer and develop our business relationship with you and, if applicable, the corporation or other legal entity you represent;

- 4.10 to provide you with marketing communications and advertising that we believe may be of interest to you or that you may have opted for;
- 4.11 resolve disputes or troubleshoot problems;
- 4.12 to enforce and comply with the law, including to conduct an investigation, to protect our rights or those of a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity;
- 4.13 enforce our Terms;
- 4.14 to analyse, research, innovate and improve Flexiple; or
- 4.15 for the purposes disclosed to you at the time of collection.

5 GROUNDS OF PROCESSING

We use your personal information for the purposes described under Clause 4 (*Use of Information*) above:

- 5.1 *To Honour Our Contractual Commitments to You.* This includes processing of information to meet our contractual obligations such as to take steps in anticipation of entering into a contract with you or our obligations towards our investors;
- 5.2 *For Our Legitimate Interests.* We process information on the ground that it furthers our legitimate interests in commercial activities, such as those described under Clause 4 (*Use of Information*) above, in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals; or
- 5.3 *To Comply with Legal Obligations.* We need to use and disclose your information in certain ways to comply with our legal obligations.

6 INFORMATION WE SHARE WITH OTHERS

- 6.1 We will not sell your information. However, we do share your information with others for the purposes mentioned above.

S. No.	Person Shared With	Purpose for Sharing
1.	Service Providers	<p>We work with third party service providers to execute various functionalities of Flexiple and we may share your information with such service providers to help us provide our services. Some of the service providers we work with include:</p> <ul style="list-style-type: none"> ● Cloud hosting, storage, networking and related providers;

		<ul style="list-style-type: none"> ● SMS providers; ● Payment and banking providers; ● Marketing and analytics providers; and ● Security providers.
2.	Consumers	We may share your personal details such as resume, prior work experience and identification documents with Consumers who choose to engage you for your services.
3.	Affiliates and Change of Control	We may disclose your information to our affiliates when it is necessary to perform services on our behalf or on your behalf, to provide advertising and promotional services, or to provide customer service, etc. We may also disclose personal information as part of a corporate transaction such as a merger or sale of assets.
4.	Third Party Services	Flexiple may include links to or could otherwise enable you to access products or services of third parties whose privacy practices are different from ours. If you provide your information to such third parties, your information will be handled as per their privacy policy and not ours.
5.	Law Enforcement	We may share your information with third parties or law enforcement agencies if we have to do so under the applicable law or to enforce our Terms or when we believe that there is a need to protect you or other people from any harm.

6.2 Notwithstanding the foregoing, we may share anonymised data with other entities. Here, anonymised data means data which is irreversibly processed or converted so that the data principal cannot be identified and such data is no longer considered personal information under the law.

7 INTERNATIONAL TRANSFERS

We are primarily based in India, and our affiliate entities are located throughout the world. Depending on the scope of your interactions with Flexiple, your personal information may be stored in or accessed from multiple countries, including India. Whenever we transfer personal information to other jurisdictions, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by applicable data protection laws.

8 YOUR RIGHTS

- 8.1 *Rectification*: Remember, you have the ability to control your personal information. You can ask us to correct anything that you think is wrong with the personal information we have on record about you. Of course, we might need you to give us a few more details, such as which part needs an update, why you feel so, what identification documents you have (so that we know you are who you say you are), etc. Despite our best efforts, if we can't fulfil your request, we will get back and explain the reasons why (for instance, if you have not given what is required).
- 8.2 *Withdrawal of Consent*: You have a right to change your mind and ask us to stop using your personal information. However, if you do so, you may no longer be able to use a particular feature or service, if such feature or service requires your personal information. If collection of personal information is mandatory, we will try making that clear at the time of collection so that you know.
- 8.3 *Erasure*: You have the right to demand us to erase your personal information and we will do so without undue delay, provided that the data is no longer required by us and there is no legal requirement to retain the data.
- 8.4 *Confirmation and Access*: You have the right to seek a confirmation from us as to whether any of your personal information is being or has been processed. If yes, you may ask us for summary of such processed information. You also have the right to ask us for a brief summary of the processing activities undertaken by us.
- 8.5 *Right to Data Portability*: You have the right to seek your personal information held by us in a structured, machine-readable format, and ask us to transfer it to a third party in that format. We may not be able to provide you data in this manner, if this is technically infeasible or would reveal a trade secret or business confidential information.
- 8.6 *Right to Opt-out*: We or our service providers may communicate with you through voice calls, text messages, emails, notifications, or other means. The communication may relate to (a) Flexiple and its services; (b) promotional offers; or (c) any other information that we may want to share with you. You may opt out of receiving information about promotional offers by writing to our grievance officer at hrishikesh@flexiple.com. But even if you opt out of receiving information from us, we will still send you non-promotional communication.
- 8.7 *Right to Lodge Complaints*: You have the right to lodge complaints about our data processing activities by filing a complaint with our grievance officer as per Clause 13 (*Contact Us*) of this Privacy Policy.

- 8.8 *Right to seek review of automated decisions*: If you believe that certain decisions based exclusively on automated decision making affect your rights, you may seek a human review of such decisions. For example, when our selection algorithm is exclusively involved in shortlisting profiles for a project, you may seek a human review of such shortlisting process.
- 8.9 Finally, because there is no common understanding about what a “*Do Not Track*” signal is supposed to mean, we don’t respond to those signals in any particular way.

9 RETENTION OF INFORMATION

- 9.1 We retain personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include, without limitation:
- 9.1.1 the length of time we have an ongoing relationship with you and provide our services to you (for example, for as long as you have an account with us or keep using Flexiple);
 - 9.1.2 whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and/or
 - 9.1.3 whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).
- 9.2 But we may continue to use the anonymised data aggregated or in combination with anonymised data of others. We use this for analytics, research and other business purposes.
- 9.3 We will not hold your information longer than that necessary and delete it thereafter in a safe and secure manner.

10 OTHER WEBSITES/ EXTERNAL LINKS

Flexiple may contain links to other websites. Privacy practices of such third parties are not in our control and are described in their own separate privacy policies. If you use public forums – such as social networking services, internet bulletin boards, chat rooms, or blogs, you should be aware that any personal information you disclose can be read, collected, or used by others. You agree that we would have no control over the information in such an event. We encourage you to read the privacy policies of all such third parties.

11 CHANGES TO THE PRIVACY POLICY

We reserve the right to amend, modify or alter this Privacy Policy from time to time to reflect changes in the law, the features of our services, or advances in technology. The information that

we collect is subject to the Privacy Policy in effect at the time such information is being used. In the event of any changes to this Privacy Policy, the changes shall be updated here. Therefore, it is advised to bookmark this page and/or periodically review this page to make sure you have the latest version. Your continued use of Flexiple following the posting of changes to this Privacy Policy shall constitute your consent and acceptance of those changes.

12 CHILDREN’S DATA

You must be the age of majority in your jurisdiction to be able to register with Flexiple and avail our services. We do not knowingly collect personal information from persons below the age of majority under applicable law (“**Minors**”). If we find out that a Minor has given us personal information, we will take steps to delete that information and terminate the relevant account. If you believe that we might have any information from or about a Minor, please contact our grievance officer as per Clause 13 (*Contact Us*).

13 CONTACT US

In order to keep your information accurate and complete, please contact us as specified below. Also, if you have any questions or comments about the Privacy Policy, please write to our grievance officer Mr. Hrishikesh Pardeshi at hrishikesh@flexiple.com. For the purposes of the GDPR, our grievance officer is also our Data Protection Officer (DPO).

While we endeavor to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our grievance officer, by mail or email as above. We will acknowledge your formal complaint as soon as reasonably practicable.

If you are in the European Union, you can choose to instead lodge a complaint with your local Data Protection Authority (DPA). The list of DPAs is at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.