

PRIVACY POLICY

We take YOUR PRIVACY seriously and do our best to protect your personal data. Through this privacy policy, Learn how we use YOUR PERSONAL DATA and please reach out to us, for requests and clarifications.

DVG Tech Solutions LLC ("DVG", "DVG Tech", "the Company", "we", "our" or "us") is committed to protecting the privacy and security of your personal information. This Privacy Policy describes how DVG Tech may collect, use, disclose, and safeguard personal information that we may collect about you through our websites, offline and/or, any other means such as during interactions with our corporate suppliers and customers, via trade shows or other offline interactions, where applicable. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to exercise your rights and get answers to your questions. Our privacy practices with respect to personal information about our employees and contractors, past and present, are addressed through other internal company policies and procedures, and are outside the scope of this Policy.

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1. Information We Collect About You

We collect, maintain, and use different types of personal information in the context of our relationship or potential relationship with you. We ask for your consent to collect this information when you enter our website or when you speak to us over phone or in person.

Information collected by us can be,

1. Aggregated visitor statistics (these are in most cases NOT personally identifiable. However, we cannot guarantee that they are not in ALL cases.)
2. Personally identifiable information of
 - a. candidates, job seekers or potential employable persons
 - b. customers, hiring managers, or recruitment / talent acquisition partners who are in need of getting right talents for the business

We make at most efforts to ensure that the aggregated visitor statistics are not personally identifiable information. At any given point in time, do send us a request if you need us to delete any of your personal data.

The following provides examples of the type of information that we collect from you and how we use the information.

Context	Categories of Information	Primary Purpose for Collection and Use of Information
Candidate Information (Job seekers or people looking to be hired)	We collect basic identifying information such as your name, title, employer, and contact information such as your work and/or personal email address, and telephone numbers (including your mobile number). We also collect information from LinkedIn which is public information shared by either candidate (profile information) or customer (company related or requirements related)	We have a legitimate interest in communicating with our clients concerning normal business administration such as projects, services, and billing. We have a legitimate interest in fulfilling our contract with you for the provision of services.
Client Information	We collect the names and contact information of our clients and their employees with whom we may interact. We obtain job description or requirement which determines the category / type of the candidate we need to select or profile we attempt to offer.	We have a legitimate interest in contacting our clients and communicating with them concerning normal business administration such as projects, services, and billing. We are willing to service our customers in finding the right candidate for their requirement.
Cookies and First Party Tracking	We use cookies and web beacons, clear GIF, pixels, internet tags, and other similar tracking technologies (collectively “tracking technologies”) to monitor how you interact with our websites. This may include links you click on, information that you share via our online forms, or identifying information about your device or browser.	We have a legitimate interest in making our website operate efficiently, providing account related functionalities, understanding how you interact with our websites to better improve them, and maintaining security standards. We also have a legitimate interest in detecting and preventing fraud.
Cookies and Third Party Tracking	We collect information about your internet or other network activity including your device identifier, Internet Protocol (IP) address, mobile ad identifier, or similar unique identifiers, so that we can provide advertising about products and services tailored to your interests on our websites, or on other websites.	We have a legitimate interest in engaging in behavior-based advertising.
Email Interconnectivity	If you receive email from us, we may use certain tools to capture data related to when you open or read our messages.	We have a legitimate interest in understanding how you interact with our communications to you.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-	We have a legitimate interest in receiving, and acting upon, your

	mail address, as well as any other content that you send to us, in order to action.	feedback or issues. We also have a legitimate interest in verifying that we receive the request from a genuine subject and no one pretending to be the subject.
Mailing List	When you sign up for one of our mailing lists we collect basic identifying and contact information such as your name, email address or postal address.	We have a legitimate interest in identifying unique visitors, and in understanding how users interact with our communication.
Mobile Devices	We may collect information from your mobile device such as unique identifying information broadcast from your device when visiting our websites.	We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.
Supplier Relationship Management	We collect certain contact and related business information (name, email address, professional contact information) when you or your organization provides us with certain products or services. In some instances, we may collect certain background or screening information to the extent needed and in accordance with applicable law.	We have a legitimate interest in administering our relationship with our suppliers and performing our contract with your organization. We also use such information to administer and maintain our relationship with your organization.
Social Media Information	We may collect, as a result of using third party social media plugins, widgets, or other tools, information related to your social media usage as it relates to our websites.	We have a legitimate interest in sharing our social media pages with you.
Web Logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address, domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and the visitors to our websites.

2. How We Collect Your Personal Information

We collect your personal information in the following ways, pursuant to applicable law:

- a. Directly from you, when you use any of our product, when you use any of our partners products, when you interact with us or, when you apply for our services or register a request with us related to any of your personal data recorded in our systems called “Data Subject Access Request (DSAR)” process.
- b. Through our use of cookies in websites and other automated data collection technologies, when you visit our website, or when you interact with our online advertisements.
- c. From third parties, including business partners, our affiliates, third parties we have partnered with for marketing and other purposes. In such cases, we ensure confidentiality agreements with non-

disclosure clauses to ensure such third parties follow defined protocols to keep data confidential and use only for processes for which consent has been provided by you.

3. How We Use Your Personal Information

In addition to the above purposes, we use your personally identifiable data and information for the purposes outlined below:

- To provide services to your business or employer
- To respond to inquiries related to support, employment opportunities, or other requests;
- To send marketing and promotional materials, including information relating to our services;
- To comply with laws or regulations to which the Company is subject;
- To comply with our contractual obligations;
- To conduct research and analytics related to our websites and services, including combining any or all of the information that we collect or obtain;
- To enforce, exercise, or defend legal claims;
- To detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of us and our customers, employees, or others; and
- For internal administrative purposes, as well as to manage our relationships.
- Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. Our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our general interest in conducting our business. Note that this Privacy Policy may be updated to notify you of additional purposes for which we process your personal information.

4. Disclosures of Your Personal Information

In addition to the specific situations discussed elsewhere in this policy, we may disclose your personal information in the following situations:

- **Affiliates.** We may disclose information to our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control) in the course of our normal business operations.

- **Legal or Regulatory Requests and Investigations.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws or regulations. We may also need to disclose your personal information with tax authorities, courts, regulators, the police and other governmental authorities where we are required or permitted to do so by law.

- **Other Disclosures with Your Consent.** We may ask to disclose your information to other unaffiliated third parties who are not described elsewhere in this Privacy Policy.

- Protection of the Company or Others. We may disclose your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

- Third-Party Service Providers. We may disclose your information with service providers. Among other things, service providers may help us to administer our website, provide technical support, and assist in the fulfillment of services.

De-identified Personal Information. We may disclose or use aggregated or de-identified data for any lawful purpose. De-identified information is generally not considered to be Personal Information under applicable laws.

5. Data Security

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we maintain reasonable physical, technical and procedural safeguards that are designed to protect your personal information against unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any privacy or security event relating to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites may permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account by using one of the methods listed below under "Contact Information."

6. Retention Period

We retain information about you and your relationship with us for as long as is needed to fulfill our legitimate business purposes outlined in this Policy. The specific periods for which we keep information about you vary depending on the nature of the information, why we need it, and whether the personal information is de-identified. We also consider the minimum necessary retention period prescribed by applicable laws, recommended by industry standards, and stated in contracts and other legal obligations.

Resume or CV we receive from you are maintained for the period of service as required by you or our customer. After the tenure of the service, we will remove them from our database but may inadvertently keep copies of it in old emails of employees. We make all efforts to ensure other personally identifiable information such as copy of SSN, copy of license or Real ID, etc. are deleted from our system when it is not required.

7. Your Rights in Relation to Your Personal Information

Depending on your location, you may have the following rights with regard to your personal information:

- Notification of Employment Opportunities. You may choose to provide us with your email address for the purpose of allowing us to send employment or candidate opportunities to you. You can stop receiving these emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive these emails, we may still send you service related communications.

- Request access to your personal information. You have the right to request access to personal information we hold about you. Specifically, you have the right to request access to information about the categories of personal information concerned and categories of recipients to whom the personal information has been or will be disclosed, and the sources from which we receive that personal information among other information. You generally have the right to receive this personal information, in a structured, commonly used, and machine-readable format so you can transmit this personal information to another entity.

- Request correction or deletion of your personal information. You may request that we correct your personal information that is inaccurate or incomplete or delete your personal information. There may be instances where applicable law or regulatory requirements allow or require us to refuse a deletion request. For example, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.

- Revocation Of Consent. If you revoke your consent for the processing of personal information then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us. Please refer to contact information section for details on how to contact us.

- Opt-Out of the Sale or Sharing of Personal Information. We do NOT sell personally identifiable information to third parties for commercial considerations. We have your personal information stored in third party hosted applications and at times, cloud servers. In such cases, we take at most care to legally / contractually bind third parties involved in operations.

- Automated Processing or use of AI: We do not use any technology that makes a significant decision based solely on automated processing (i.e., without human intervention). We also do not use AI for decision making. In the event there is a change to this, you have the right to object to that automated processing or use of AI unless that decision is required or authorized by law.

- Portability. You may have a right to ask us to provide your personal information to a third party.

- Online Tracking. Some web browsers incorporate a "Do Not Track" (DNT) or similar feature that signals to websites that a visitor does not want to have his/her online activity and behavior tracked. We do not currently respond to DNT signals.

- **Right of Non-Discrimination/Retaliation:** We do not discriminate against individuals who exercise any of their rights described in this Privacy Policy, nor do we retaliate against individuals who exercise these rights

- **Right to Restrict Use of your Sensitive Personal Information.** You may have the right to request the restriction of processing of your sensitive personal information in certain instances. At the current time, however, we do not use or disclose sensitive personal information for purposes other than those described in this Policy and these uses cannot be limited under applicable law.

If you choose to assert any of these rights under applicable law, we will respond within the time period prescribed by such law. Please note that many of the above rights are subject to exceptions and limitations. Your rights and our responses will vary based on the circumstances of the request.

A person authorized to act on your behalf may make a verifiable request related to your personal information. If you designate an authorized person to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf.

Your verifiable request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative of that person; and (ii) describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

If you would like to exercise any of the above rights (to the extent these rights are provided to you by law), you may contact us using the contact information at the end of this policy statement.

8. **Other Important Information**

The following additional information relates to our privacy practices:

- **Transmission Of Information To Other Countries.** As a multi-national company we transmit information between and among our affiliates. As a result your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information at the end of this policy statement.

- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.

- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the

time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

- Minors. This site is not intended for use by children under the age of 13, and we do not knowingly collect or use any personal information from such children.

9. California Information Sharing Disclosure

Information for California Residents. If you would like more information concerning the categories of personal information (if any) we disclose to third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below.

10. Contact Information

If you have any questions about this Privacy Policy or you need to submit a “Data Subject Access Request”, please contact us at info@dvgt.com with verifiable proof of identity or authorization. If you are not satisfied with our response, you may have a right to lodge a complaint with your local supervisory authority.

Alternately, you can send us request via snail mail to:

666 Plainsboro Rd Suite 1010 Plainsboro NJ 08536

Effective Date: March 15, 2024. This is the first version of our privacy policy.

Signed by:

N Geedhara

Vice President & CEO, DVG Tech Solutions LLC