SUN DEW SOLUTIONS PRIVATE LIMITED

Privacy Policy

Digital Personal Data Protection Act 2023

Effective Date: [05/11/2026]
Last Updated: [05/11/2026]
Sun Dew Solutions Private Limited ("**Sundew**", "**Company**", "**we**", "**us** or "**our**") respects the privacy of individuals whose personal data is processed by us.

1. Scope of This Privacy Policy

This Privacy Policy applies to personal data processed in connection with your general use of the Website.
The following activities are addressed through separate privacy notices or consent mechanisms, where applicable:

- **Cookies and similar technologies:** covered under our Cookie Notice / Cookie Consent mechanism;
- **Talent pool / recruitment activities:** covered under the applicable Talent Pool Privacy Notice and Consent Form; and
- **Website enquiries:** where you voluntarily submit your email address, contact details or query through an enquiry mechanism, such processing is governed by the applicable **Enquiry Privacy Notice**.

Where a separate privacy notice applies to a particular processing activity, that notice will provide the specific information relevant to that activity.

2. Who We Are

Sun Dew Solutions Private Limited is the Data Fiduciary responsible for the processing of personal data covered by this Privacy Policy, to the extent applicable under the Digital Personal Data Protection Act, 2023 ("**DPDP Act**") and applicable rules.
Registered/Corporate Address: [Insert Address]
Privacy Contact / Privacy Lead: [Name / Designation]
Email: [Privacy Email Address]

3. Personal Data We May Process

Depending on how you interact with the Website, Sundew may process limited personal data such as:
A. Identification and Professional Information
Where voluntarily provided:

- Name;
- Designation;
- Organisation/company name;
- Professional information; and
- Other information necessary to identify or communicate with you.

B. Contact Information
Where provided:

- Email address;
- Telephone/mobile number;
- Business address; and
- Other contact information.

C. Technical and Website Usage Information

When you visit the Website, certain technical information may be generated or collected, such as:

- IP address;
- Browser type and version;
- Operating system;
- Device-related information;
- Date and time of access;
- Website pages accessed;
- Referring or exit pages;
- Basic server log information; and
- Information relating to interaction with the Website.

Such information will be treated as personal data where it relates to or can reasonably be associated with an identifiable individual.

D. Information You Voluntarily Provide

We may process personal data that you voluntarily provide to us through the Website or through communications initiated by you.

Where a particular form or Website feature collects personal data for a specific purpose, the applicable privacy notice or consent mechanism will provide further details.

4. Purposes of Processing

Sundew may process personal data for the following purposes, as applicable:

- To operate, maintain and secure the Website;
- To monitor and troubleshoot Website performance;
- To respond to requests or communications submitted through the Website;
- To provide information about our services where requested;
- To improve the functionality, usability and performance of the Website;
- To maintain Website security and prevent unauthorised access, fraud, misuse or other unlawful activities;
- To maintain appropriate records relating to Website interactions;
- To comply with applicable legal, regulatory and statutory requirements;
- To establish, exercise or defend legal rights and claims; and
- For other purposes specifically communicated to you at the time your personal data is collected.

Where processing requires consent, Sundew will obtain consent through an appropriate affirmative mechanism. Where processing is permitted under a legitimate use recognised under the DPDP Act, Sundew may process the relevant personal data without relying on consent, subject to applicable legal requirements.

5. Consent

Where Sundew relies on consent to process personal data, consent will be obtained through a clear affirmative action and will relate to a specified purpose.

Consent will be:

- Free;
- Specific;
- Informed;
- Unconditional; and
- Unambiguous.

Sundew will not treat general Website access or browsing as consent to every form of personal data processing. Where consent is required for a particular processing activity, the relevant consent mechanism or privacy notice will provide the applicable details.

6. Withdrawal of Consent

Where processing is based on consent, you may withdraw your consent at any time through the mechanism provided by Sundew.
The mechanism for withdrawing consent will be reasonably easy to use and, where applicable, comparable to the manner in which consent was provided.
Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.
Following withdrawal, Sundew will cease processing the relevant personal data based solely on consent within a reasonable period, unless continued processing is required or authorised under the DPDP Act, applicable rules or another applicable law.
Withdrawal may have consequences where the relevant processing is necessary to provide a particular service or fulfil a request.

7. Sharing and Disclosure of Personal Data

Sundew may share personal data where reasonably necessary for the purposes described in this Privacy Policy and as permitted or required by applicable law.
Personal data may be shared with:

- Authorised employees and personnel of Sundew;
- Service providers and Data Processors supporting Website operation, hosting, IT, security and other business functions;
- Professional advisers, auditors and consultants;
- Government, regulatory, law-enforcement or judicial authorities where required or permitted by law; and
- Other parties where disclosure is necessary to comply with a legal obligation, protect rights or property, prevent fraud or misuse, or establish, exercise or defend legal claims.

Sundew will limit access to personal data to what is reasonably necessary for the relevant purpose and will require appropriate confidentiality and security measures from relevant personnel and service providers.
Sundew does not sell personal data.

8. Data Processors and Service Providers

Sundew may use third-party service providers to support its business and Website operations.
Such providers may perform functions including:

- Website hosting;
- IT and technical support;
- Cybersecurity;
- Cloud services;
- Website maintenance;
- Communication services; and
- Other operational support.

Where such providers process personal data on behalf of Sundew, Sundew will take appropriate measures to ensure that personal data is processed only for authorised purposes and protected through appropriate contractual, technical and organisational safeguards.

9. Data Security

Sundew implements reasonable technical and organisational measures designed to protect personal data against unauthorised access, disclosure, alteration, loss, misuse or destruction.
These measures may include:

- Access controls;
- Authentication mechanisms;
- Confidentiality obligations;
- Security monitoring;
- Appropriate technical safeguards; and

- Periodic review of security practices.

While Sundew takes reasonable measures to protect personal data, no method of transmission or electronic storage can be guaranteed to be completely secure.

10. Retention of Personal Data

Sundew will retain personal data only for as long as reasonably necessary to fulfil the purpose for which it was collected or as required or permitted under applicable law.

The applicable retention period may depend on:

- The purpose for which the personal data was collected;
- The nature of the processing;
- Legal, regulatory, accounting or audit requirements;
- The need to establish, exercise or defend legal claims; and
- Other lawful requirements applicable to Sundew.

When personal data is no longer required for the applicable purpose or retention period, Sundew will securely delete, destroy or anonymise it, subject to applicable legal requirements and reasonable backup/archival practices.

11. Your Rights as a Data Principal

Subject to the DPDP Act and applicable law, you may have the following rights in relation to your personal data:

- **Right to Access Information:** You may request information about the personal data being processed by Sundew and the processing activities, as applicable.
- **Right to Correction and Updating:** You may request correction, completion or updating of personal data that is inaccurate, incomplete or outdated.
- **Right to Erasure:** You may request erasure of personal data where applicable and subject to any requirement or lawful basis for continued retention or processing.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw your consent at any time.
- **Right to Grievance Redressal:** You may raise a grievance regarding the processing of your personal data.
- **Right to Nominate:** You may nominate another individual to exercise your rights in accordance with applicable law.

The exercise of these rights may be subject to applicable legal requirements and limitations.

12. How to Exercise Your Rights

To exercise an applicable Data Principal right, withdraw consent or raise a privacy-related grievance, you may contact:

Privacy Lead / Authorised Privacy Contact: [Name / Designation]
Email: [Privacy Email Address]
Postal Address: [Address]

Please provide sufficient information to enable Sundew to identify the relevant request and respond appropriately.

Sundew will process requests in accordance with the timelines and procedures prescribed under applicable law and its internal privacy procedures.

13. Grievance Redressal

If you have any concern regarding the processing of your personal data, you may first raise the concern with Sundew through the above privacy contact.

Sundew will provide an appropriate mechanism for grievance redressal and will address grievances within the applicable statutory timelines.

Where applicable, a Data Principal may approach the **Data Protection Board of India** in accordance with the DPDP Act and applicable rules after following the prescribed grievance redressal process.

14. Children's Personal Data

The Website is not intended to knowingly collect personal data from children below 18 years of age.
Sundew will process children's personal data only where permitted under applicable law and, where required, after obtaining verifiable parental consent.
Sundew will not knowingly undertake processing of children's personal data in a manner prohibited by the DPDP Act or applicable rules.

15. Third-Party Websites

The Website may contain links to third-party websites, applications or services.
Sundew does not control the privacy practices of such third parties. Once you leave the Sundew Website, the processing of your personal data by the third party will be governed by that party's applicable privacy notice or policy.
You are advised to review the privacy practices of third-party websites before providing them with personal data.

16. Changes to This Privacy Policy

Sundew may update this Privacy Policy from time to time to reflect changes in:

- Applicable laws or regulations;
- Website functionality;
- Business or processing practices; or
- Privacy and security practices.

Where a change materially affects the manner or purposes for which personal data is processed, Sundew will provide an appropriate updated notice and obtain fresh consent where required by applicable law.

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17. Recruitment Through the Website Career Page

Sun Dew Solutions Private Limited (“Sundew”, “Company”, “We”, “Us” or “Our”) respects the privacy of individuals who apply for employment opportunities through the **Sundew website**.
This Recruitment Privacy Policy explains how Sundew collects, uses, processes, stores, retains and protects the personal data submitted by candidates through the recruitment section of the Sundew website in connection with current job openings.
This Policy applies specifically to personal data collected through the **Sundew website's job application process** and covers the processing of candidate information for recruitment, evaluation and selection for the position applied for.
Where a candidate separately provides consent for consideration for future employment opportunities, this Policy also applies to the retention and use of the candidate's personal data for that specific purpose.

18. Personal Data We Collect

Depending on the requirements of the position, Sundew may collect the following personal data through the website recruitment form:

18.1 Identification and Contact Information

- Name;
- Email address;
- Mobile/telephone number; and
- Address and location.

18.2 Professional Information

- Total work experience;
- Current organisation;
- Current designation;

- Previous employment information, where provided;
- Professional experience;
- Skills and areas of expertise; and
- Other professional information provided in the application.

18.3 Qualification and Application Information

- CV/resume;
- Educational and professional qualifications;
- Certifications and supporting documents;
- Information provided in the application form; and
- Other information voluntarily provided by the candidate that is relevant to the position applied for.

Sundew will seek to collect personal data that is relevant and reasonably necessary for the recruitment process.

19. How We Collect Your Personal Data

Sundew collects candidate personal data directly from the candidate through the **job application form available on the Sundew website**.
The information may be provided by the candidate through the application form, CV/resume upload, certification upload and other fields made available as part of the online application process.

20. Purpose of Processing

Sundew may process the personal data collected through the website recruitment process for the following purposes:

- To receive and manage the candidate's application;
- To evaluate the candidate's qualifications, experience, skills and suitability for the position applied for;
- To review the candidate's CV/resume and supporting information;
- To shortlist candidates;
- To communicate with candidates regarding their application;
- To schedule interviews or other recruitment activities, where applicable;
- To request additional information where required for recruitment purposes;
- To make recruitment and selection decisions;
- To communicate the outcome of the recruitment process;
- To maintain appropriate recruitment records; and
- Where the candidate has provided separate consent, to retain and consider the candidate's profile for suitable future employment opportunities.

Sundew will not use the candidate's personal data for purposes unrelated to the recruitment process unless such processing is permitted or required under applicable law.

21. Processing for the Current Job Vacancy

When a candidate submits an application for a particular vacancy through the Sundew website, Sundew may process the personal data provided by the candidate to evaluate and manage that application.
This may include reviewing the candidates:

- Work experience;
- Current organisation and designation;
- Skills and areas of expertise;
- Qualifications and certifications;
- CV/resume; and
- Other information relevant to the requirements of the position.

The personal data may be accessed by authorised personnel within Sundew who are involved in the recruitment and selection process.
Submission of an application does not guarantee selection or employment.

22. Future Employment Opportunities

A candidate who applies for a current vacancy may also be considered for suitable employment opportunities that may arise in the future.
Where Sundew wishes to retain and use a candidate's personal data for this additional purpose, **separate and voluntary consent** will be obtained from the candidate.
Where such consent is provided, Sundew may retain the candidate's CV/resume and relevant recruitment information for the purpose of considering the candidate for suitable future employment opportunities.
Future recruitment consent is optional and is **not a condition for applying for or being considered for the current vacancy**.

23. Retention for Future Employment Opportunities

Where a candidate provides consent for future employment opportunities, Sundew may retain the candidate's relevant recruitment information for **up to 12 months from the date of consent**.
During this period, Sundew may review the candidate's profile against suitable future vacancies and may contact the candidate regarding an employment opportunity that may be relevant to the candidate's qualifications, experience or skills.
The 12-month period is the retention period defined by Sundew for this future recruitment purpose.
At the end of the applicable retention period, the relevant personal data will be securely deleted or anonymised, unless further retention is required or permitted under applicable law.

24. Candidates Not Selected for the Current Vacancy

Where a candidate is not selected for the position applied for, Sundew will handle the candidate's personal data based on the applicable recruitment purpose and the candidate's choice regarding future employment opportunities.

- **Where Future Recruitment Consent Has Been Provided**
  If the candidate has provided separate consent for future employment opportunities, Sundew may retain the candidate's CV and relevant recruitment information for up to **12 months** for consideration against suitable future vacancies.
- **Where Future Recruitment Consent Has Not Been Provided**
  If the candidate has not provided consent for future employment opportunities, Sundew will retain the candidate's personal data only for the period reasonably necessary to complete and document the current recruitment process, subject to any applicable legal or other permitted retention requirements.

The candidate's CV will not be retained for future recruitment purposes without the applicable consent.

25. Sharing and Disclosure of Personal Data

Candidate personal data collected through the Sundew website may be accessed by authorised personnel within Sundew who require the information for recruitment and selection purposes.
This may include:

- Human Resources personnel;
- Hiring managers;
- Relevant department heads; and
- Other authorised Sundew personnel involved in the recruitment process.

Sundew will not sell, rent or commercially trade candidate personal data.
Candidate personal data will not be disclosed to external parties for unrelated marketing purposes.
Where disclosure is required by applicable law or by a lawful order or request of a competent authority, Sundew may disclose the relevant personal data as required or permitted by law.

26. Data Security

Sundew recognises the importance of protecting candidate personal data and maintains reasonable technical and organisational security measures to protect such data against unauthorised access, disclosure, alteration, loss, misuse or destruction.

Access to candidate information is restricted to authorised personnel who require the information for recruitment-related purposes.
Sundew will take reasonable steps to ensure that candidate personal data is handled securely throughout the recruitment process and retained only for the applicable period.

27. Withdrawal of Future Recruitment Consent

Where a candidate has provided separate consent for future employment opportunities, the candidate may withdraw that consent at any time.
The detailed mechanism for withdrawing future recruitment consent is provided in the **Future Employment Opportunities Consent Form**.
Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.
Following withdrawal, Sundew will cease further processing of the candidate's personal data for future recruitment purposes based on that consent, subject to any processing or retention required or permitted under applicable law.

28. Candidate Privacy Rights

Subject to applicable law, candidates may have the following rights in relation to their personal data:

- The right to obtain information about their personal data being processed;
- The right to request correction, completion or updating of inaccurate or incomplete personal data;
- The right to request erasure of personal data, where applicable;
- The right to withdraw consent where processing is based on consent;
- The right to grievance redressal; and
- The right to nominate another individual, where applicable under the applicable data protection law.

These rights may be subject to conditions and limitations prescribed under applicable law.

29. Accuracy of Information

Candidates are responsible for ensuring that the personal data and other information provided through the application form and submitted documents is accurate, complete and not misleading.
Where a candidate becomes aware that information provided to Sundew is inaccurate or incomplete, the candidate may contact Sundew using the details provided in this Policy.

30. Changes to this Recruitment Privacy Policy

Sundew may update this Recruitment Privacy Policy from time to time to reflect changes in its recruitment practices, applicable law, regulatory requirements or internal privacy procedures.
Where changes materially affect the manner in which candidate personal data is processed and additional notice or consent is required, Sundew will take appropriate steps to provide such notice or obtain such consent.
The updated version of this Policy will be made available through the relevant recruitment section of the Sundew website.

31. Contact and Grievance Redressal

If you have any questions, requests or grievances concerning the processing of your personal data in connection with recruitment through the Sundew website, you may contact:
Privacy Lead:
Sun Dew Solutions Private Limited
Email: data.privacy@sundewsolutions.com
Subject: Recruitment Data Privacy / Grievance