Privacy Policy – Secure Meters Ltd Career Portal

Purpose of This Privacy Policy

- 1.1 Secure Meters Ltd ("Secure", "we", "our", or "the Company") is committed to protecting the privacy, confidentiality, and security of the personal information of all applicants and individuals who interact with our Career Portal.
- 1.2 This Privacy Policy describes how we collect, process, use, store, and share your personal data in accordance with applicable global data protection laws, including but not limited to the General Data Protection Regulation (EU GDPR), the UK GDPR, India's Digital Personal Data Protection Act (DPDPA), and other relevant international privacy regulations.
- 1.3 This policy applies to all candidates, applicants, interns, trainees, and individuals who submit their personal data through our Career Portal for the purpose of recruitment and employment opportunities.
- 1.4 This Privacy Policy does not form part of any contract of employment or contract for services.
- 1.5 We may update this Privacy Policy periodically and will notify you of material changes.

2. Definitions

- 2.1 **Data Controller/Fiduciary:** Secure is the data controller/fiduciary of your personal information, meaning we determine the purposes and means of processing your data.
- 2.2 **Data Protection Officer (DPO):** We have appointed a DPO to oversee compliance. You may contact the DPO with questions or concerns via <u>Personal Information Access Request (External)</u>.
- 2.3 **Processing:** Refers to any operation performed on personal data, including collection, storage, use, disclosure, and deletion.
- 2.4 **Personal Data:** Information that identifies or can be used to identify you directly or indirectly (e.g., name, email, phone number, resume, location).

3. Data Protection Principles

We commit to the following principles, regardless of jurisdiction:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Integrity and confidentiality

4. Personal Information We Collect

Through the Career Portal, we may collect and process:

- **Identity Information**: Name, date of birth, gender, nationality.
- **Contact Information:** Email address, phone number, postal address.
- **Professional Information**: Educational qualifications, resume/CV, work experience, skills, certifications, references.
- **Technical Information:** IP address, browser type, login data, and usage activity on the portal.
- **Other Information**: Any additional information you voluntarily provide during the application process.

5. How and Why We Use Your Data

We use your data to:

- Manage and evaluate job applications.
- Assess suitability for current and future roles.
- Communicate with you regarding recruitment status.
- Conduct background and reference checks (where applicable).
- Maintain candidate talent pools for future opportunities.
- Comply with legal and regulatory requirements.
- Ensure the security and proper functioning of the Career Portal.

6. Lawful Basis for Processing

We process personal data on the following lawful grounds:

- **Consent** (where required, e.g., to store data for future roles).
- **Contractual necessity** (to assess your application prior to entering into an employment contract).
- **Legal obligation** (to comply with employment and immigration laws).
- Legitimate interest (to maintain recruitment records and improve hiring processes).

7. Data Sharing

We may share your personal data with:

- Internal HR and recruitment teams.
- Secure Meters group companies (India, EU, UK, and others).
- Background verification and recruitment agencies (where applicable).
- Government authorities (where legally required).
- External service providers supporting the Career Portal.

All third parties are required to comply with confidentiality and data protection obligations.

8. International Data Transfers

Your data may be transferred outside your country of residence, including India, the EU, and the UK.

We ensure appropriate safeguards are in place (such as Standard Contractual Clauses, adequacy decisions, or intra-group agreements) to protect your personal data.

9. Data Security

We use appropriate **technical and organizational measures (TOMs)** to safeguard your personal data, including:

- Role-based access controls.
- Secure servers and firewalls.
- Regular monitoring and audits.

10. Data Retention

We retain your data only for as long as necessary to complete the recruitment process and further the data is retained as per our organisation's Data Retention and Disposal Policy.

If you do not wish for us to retain your data, you may request deletion at any time

11. Your Rights

You have rights under global data protection laws, including:

- Access to your personal data.
- Correction of inaccurate or incomplete data.
- Deletion of data (right to be forgotten).
- Restriction or objection to processing.
- Data portability (where applicable).
- Withdrawal of consent (where consent is the basis for processing).
- Right to grievance redressal (India DPDPA).
- Right to lodge complaints with supervisory authorities.

Requests can be submitted to the DPO via Personal Information Access Request (External)

12. Complaints

If you have concerns, you may contact your local supervisory authority, for example:

- UK: Information Commissioner's Office (ICO)
- EU: Local Data Protection Authorities (e.g., Sweden IMY, Italy Garante)

• India: Data Protection Board of India (DPBI)

13. Changes to This Privacy Policy

We may amend this notice at any time. Updates will be posted on the Career Portal with the revised effective date.