

Privacy Policy

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Introduction

Your Privacy Is Important to Us

Xoxoday is committed to respecting your privacy while using our website and products. This Xoxoday Privacy Policy ("Policy") defines the requirements to ensure compliance with the applicable data privacy laws and regulations applicable to Xoxoday's collection, use, and transmission of Personal Data and Sensitive Personal Data.

This website is operated by Nreach Online Services Private Limited, also referred to as Xoxoday ("we", "us" or "our"). This Policy explains how we collect, use and disclose information about our users when you use our mobile application (the "App"), our website (the "Site") and other online products and services that link to this Policy (collectively, the "Service").

By using the Service, you consent to our collection, use and disclosure of your personal information as described in this Policy. We take your privacy seriously. If you have any questions about this Policy or about privacy at Xoxoday, please contact us at cs@xoxoday.com.

This Privacy Policy Describes:

- The information we collect, how we do so and the purposes of our collection.
- How we use and with whom we share such information.
- How you can access and update such information.
- The choices you can make about how we collect, use and share your information.
- How we protect the information we store about you.

Definitions

Personal Data

Any information of a Data Subject which can reasonably associate or link to an identifiable natural person — including name, identification number, location data, an online identifier, or factors specific to the physical, physiological, economic, cultural or social identity of that natural person.

Personal Information (California residents)

Information pertaining to California residents that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household. Does not include information lawfully made available from government records, or deidentified or aggregate customer information as defined under CCPA/CPRA.

Sensitive Personal Data

Any information revealing an identified or identifiable natural person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric data, data concerning health, or information concerning an individual's sex life or sexual orientation, and data relating to offenses or criminal convictions.

Process / Processing

Any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure by transmission, dissemination, alignment, restriction, erasure or destruction.

Consent

Any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they signify agreement to the processing of their Personal Data via a statement or by a clear affirmative action.

Data Subject

A particular natural person to whom Personal Data relates. Xoxoday does not collect Personal Data from Data Subjects under the age of 18.

Data Controller

A person or organization who determines the purposes for which and the manner in which any Personal Data are, or are to be, Processed. For the purposes of this Policy, this means Xoxoday and its affiliates.

Data Processor

A person or organization who Processes Personal Data on behalf of and under the instruction of the Data Controller.

Third Party

In relation to Personal Data, any person other than the Data Subject, the Data Controller, or any Data Processor or other person authorized to process data for the Data Controller.

Personal Information We Collect and Process

Information We Collect from Customer Companies

When a Customer Company indicates interest in our Service, we collect the following information via our sign-up form: full name, email address, company name and phone number.

Personal Data We Collect from Employee Users

We collect human resource (HR) information and other information about Employee Users from the Customer Company, such as: full name, email address, phone number, or any other information that may be required from time to time. This data is provided by the Customer Company's HR department directly or indirectly by allowing Xoxoday to connect customer systems like HRMS or Single Sign-On systems, and is loaded and maintained in our system to allow for analytics.

When Employee Users answer surveys or engage in conversations with peers on the App or Site, we collect employee opinions. Employee User votes or comments are connected to their authors. When a User visits our Site, we use certain Tracking Information including: email address, device ID, and IP address.

Payment Information

If a third party is not paying for the service on your behalf, we will collect the billing and financial information necessary to process your charges for Xoxoday services which require payment, which may include your postal and e-mail addresses. Our Terms of Service explain our policies and terms relevant to our charges and billing practices.

Technical and Usage Information

When you access our websites or use our Services, we collect:

- Certain technical information about your mobile device or computer system, including IP Address and mobile device ID.
- Usage statistics about your interactions with the Service, typically collected using server log files, mobile device software development kits, and tracking technologies like browser cookies.

Cookies and Automated Information Collection

When you access the Service, we collect certain technical information to analyze the usage of our sites and services, provide a more personalized experience, and manage testimonials. You can set your web browser to warn you about attempts to place cookies on your computer or limit the type of cookies you allow.

How We Use the Information We Collect

In general, we collect, store, and use your information to provide you with a safe, smooth, efficient, and customized experience. We may use information collected from you in any one or more of the following ways:

- Provide, maintain, and improve our Service.
- Provide and deliver the Service the Customer Company requests and configures, process transactions and send you related information, including confirmations.
- Investigate system issues that impact our ability to provide the Service to Users.
- Send you technical notices, updates, confirmations, security alerts, and support and administrative messages.
- Respond to your comments, questions and requests and provide customer service.
- Communicate with Customer Companies about products, services, offers, promotions, rewards, and events offered by Xoxoday and others.
- Monitor and analyze trends, usage, and activities in connection with our Service and improve and personalize the Service.
- Personalize and improve the Service, content or features that match user profiles or interests.
- Link or combine with information we get from others to help understand your needs and provide you with better service.

We will not sell, rent, or share Personal Data with third parties outside of our company without your consent, except as outlined below.

Law Enforcement and Internal Operations

Personal Data may be provided where we are required to do so by law, or if we believe in good faith that it is reasonably necessary to:

- Respond to claims asserted against Xoxoday or to comply with legal process (for example, discovery requests, subpoenas or warrants).
- Enforce or administer our policies and agreements with users.
- For fraud prevention, risk assessment, investigation, customer support, product development and debugging purposes.
- To protect the rights, property, or safety of Xoxoday, its users or members of the general public.

We will use commercially reasonable efforts to notify users about law enforcement or court-ordered requests for data unless otherwise prohibited by law.

Data Recipients, Transfer, and Disclosure of Personal Information

Xoxoday does not share your Personal Information with third parties for their direct marketing purposes. We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

Business Transfer

Xoxoday may sell, transfer, or otherwise share some or all of its assets, including your Personal Data, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy. Under such circumstances, Xoxoday will use commercially reasonable efforts to notify its users if their personal information is to be disclosed or transferred.

Third Parties

We sometimes contract with other companies and individuals to perform functions or services on our behalf, such as software maintenance, data hosting, and sending email messages. We necessarily have to share your Personal Data with such third parties as required to perform their functions. We take necessary steps to ensure that these parties protect your privacy as seriously as we do, including entering into Data Processing Addendums, EU Model Clauses, and/or ensuring EU-U.S. and Swiss-US Privacy Shield certification.

How Is My Data Protected?

We have implemented reasonable administrative, technical, and physical security measures to protect your personal information against unauthorized access, destruction, or alteration, including:

- SSL encryption (https) where we deal with personal data; Personal Data is encrypted in transit using https/ssl/tls and encrypted at rest.

- Password protection on your account.
- Rotating verification codes to access by some parties.
- Data is kept on secure, encrypted servers.
- Restricting staff access to Personal Data, protected by password logs and two-factor authentication.
- Non-Disclosure Agreements with vendors.
- Regular staff privacy and security training.

Retention and Disposal of Personal Data

User Data: 7 years from the date of termination of contract

Employees data: 8 years as per Indian Companies Act

Financial data: 8 years as per Indian Companies Act

Audit logs: 1 year

Other records: 3 years

Children's Personal Information

We do not knowingly collect any personal information from children under the age of 16. If you are under the age of 16, please do not submit any personal information through our Websites or Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy. If you have reason to believe that a child under the age of 16 has provided personal information to us, please contact us at cs@xoxoday.com.

Your Rights in Relation to Your Information

- Access: You have the right to access information about the personal data we hold about you.
- Right to be informed about the data that we collect, process and store.
- Right to object to processing: You have the right to object to processing of your personal data.
- Rectification: You have the right to request rectification of inaccurate personal data held about you.
- Erasure: To the extent permitted by applicable data protection laws, you have the right to request erasure of personal data held about you.
- Restriction of processing: This enables you to request to restrict the processing of your personal data in certain circumstances.
- Rights in relation to automated decision-making, including profiling.
- Portability: You have the right to obtain your personal data to enable you to reuse it.

To exercise any of these rights, please email us at cs@xoxoday.com.

California Privacy Rights (CCPA/CPRA)

If you are a California resident, you have the following rights:

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months, including the categories of Personal Data collected, sources, business purposes, and the specific pieces of Personal Data collected about you.

Deletion

You have the right to request that we delete the Personal Data that we have collected from you. This right is subject to certain exceptions under CCPA/CPRA — for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction you have requested.

Exercising Your Rights

To exercise the rights described above, submit a request to cs@xoxoday.com that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail. You may also authorize an Authorized Agent to exercise your rights on your behalf by providing written permission.

We will not discriminate against you for exercising your rights under the CCPA/CPRA.

Complaints and Grievances

Any complaints or grievances regarding our use of Personal Data and any communications regarding enforcement of your privacy rights should be directed to our Data Protection Officer:

Attn: Data Protection Officer

Email: cs@xoxoday.com

Updates to Our Policy

We may amend or update our Privacy Policy. We will provide you notice of amendments to this Privacy Policy, as appropriate, and update the "Last modified" date at the top of this Privacy Policy. Please review our Privacy Policy from time to time.