



Privacy Policy

V1.1

Table of Contents

1.0	INTRODUCTION.....	3
2.0	PURPOSE	3
3.0	SCOPE	4
4.0	TERMS AND DEFINITIONS	4
5.0	REVIEW AND APPROVAL OF POLICY	4
6.0	PRIVACY PRINCIPALS	5
6.01	NOTICE.....	5
6.02	PURPOSE OF COLLECTION	5
6.03	COLLECTION INITIATION	5
6.04	COLLECTION OF PERSONAL DATA	5
6.05	CONSENT	6
6.06	SHARING OR DISCLOSURE	7
6.07	DATA SECURITY	8
6.08	RETENTION	9
6.09	REVIEW (ACCESS) AND CORRECTION	9
6.010	TRANSPARENCY	9
7.0	PRIVACY RIGHTS.....	9
8.0	GOVERNING LAW AND JURISDICTION	10
9.0	FEEDBACK AND CONCERNS	10
10.0	CONTACT INFORMATION	10
	REVIEW & APPROVAL	10



1.0 Introduction

Privacy policy is published and shall be construed in accordance with the provisions of the Information Technology Act, 2000 that require publishing of the privacy policy for collection, use, storage and transfer of sensitive personal data or information, as provided under clause (OB) of sub-section (2) of section 77 read with section 43A of the Information Technology Act, 2000 (21 of 2000) and Rules made thereunder namely "Information Technology (Reasonable Security Practices and Policies and Sensitive Personal Data or Information) Rules, 2011.

It is designed to comply with the Digital Personal Data Protection Act, 2023 ("DPDP Act"), GDPR, CCPA, HIPPA and other local or international applicable laws.

This Privacy Policy ("Policy") explains how JBS ("JBS," "we," "us," or "our") collects, uses, shares, and protects personal data obtained through our websites, applications, and related services.

This privacy policy does not require any physical, electronic or digital signature.

Through this Policy, JBS intends to convey the manner in which the users' information is collated and used by JBS while providing its services in any manner. This Policy is binding on every user.

Users are requested to read and understand the policy very carefully. By reading the policy, users hereby provide their unconditional consent or agreements to JBS.

JBS reserves its right to change, edit, alter, amend, modify, review, revise or substitute this Policy with or without notice. The users signify that they have carefully read, understood and agreed to be bound by this Policy and they expressly and voluntarily accept this Policy including any change, modification or substitution made to the Policy from time to time.

The terms of this privacy policy will be effective upon users reading the same (directly or indirectly in electronic form or by use of the website or by other means) and will govern the relationship between users and JBS as defined below.

By accessing our website [Jalson – Jalson Business Solutions](#) or www.credibleplanning.com or using our SaaS platform services you consent to the practices described in this Policy.

Updates to this Policy will be communicated through our website or other appropriate channels.

2.0 Purpose

This process of Privacy Policy is to protect JBS's customer's / user's personal information and/or sensitive personal data and strive to maintain the privacy of their personal information.

Users include JBS employees, vendors, service providers and other related people and parties.

Doc. ID	A 5.34 JBS Privacy Policy	
JBS - External	V1.0	Page 3

3.0 Scope

This Policy Applies to:

- Personal data collected through websites, applications, and online platforms.
- Data provided by customers, employees, vendors, and business partners.
- Information gathered during recruitment or operational processes.
- Automatically collected data via digital platforms.

4.0 Terms And Definitions

S.no.	Term	Definition
1	Personally Identifiable Information	Information that identifies or can identify an individual, such as name, contact details, and online identifiers. Or Any information that relates to a natural person, which, either directly or indirectly, in combination with other information available is capable of identifying such person.
2	JBS	Jalson Business Solutions
2	Sensitive personal information (SPI)	Information such as financial data, biometric data, health information, or any other data classified as sensitive under applicable laws. Personal information which consists of information relating to: (i) password; (ii) financial information such as Bank account or credit card or debit card or other payment instrument details; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) Biometric information; (vii) any detail relating to the above clauses as provided to body corporate for providing service; and (viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise

5.0 Review and Approval of Policy

The policy shall be formally reviewed at the time of any major changes in the existing business environment or at least once a year by DPO (Data Protection Officer) to ensure its continuation, suitability, adequacy, and effectiveness to reflect legal, regulatory or operational changes.

Interim reviews may be triggered by:

- Significant regulatory changes (e.g. updates to GDPR, DPDP, CCPA, HIPAA)

- Changes in data processing activities or system architecture
- Introduction of new products, services or platforms that involve personal data
- Findings from internal audit or data breach investigations

Major changes to the policy shall be approved by CISO/CTO.

Minor changes to the policy shall be approved by Business/Functional Head.

6.0 Privacy Principals

JBS will follow the following Privacy principles:

6.01 Notice

While collecting information directly from the person concerned, JBS shall take such steps as are, in the circumstances, reasonable to ensure that the person concerned is having the knowledge of —

- (a) the fact that the information is being or has been collected.
- (b) the purpose for which the information is being or has been collected.
- (c) the intended recipients of the information; and
- (d) the name and address of —
 - (i) the agency that is collecting the information; and
 - (ii) the agency that will retain the information.

6.02 Purpose of Collection

The information collected shall be used for the purpose for which it has been collected.

6.03 Collection Initiation

JBS shall not collect sensitive personal information unless:

- (a) the information is collected for a lawful purpose connected with a function or activity of the body corporate or any person on its behalf; and
- (b) the collection of sensitive personal data or information is considered necessary for that specific purpose.

6.04 Collection of Personal Data

- **Direct Collection:**

Personal data is collected directly from individuals in the following situations:



Contractual engagements or use of services (e.g., names, addresses, payment details). • Communications through customer service channels.

- **Business and Professional Contacts**

Limited data such as names, job titles, and contact details may be collected from business partners and vendors.

- **Recruitment and Careers**

Applicants may provide educational and professional records, identification documents, and references for recruitment purposes.

- **Visitors to Premises**

We collect data such as visitor names, contact details, and biometric data (e.g., fingerprints). CCTV footage is recorded for security purposes.

- **Automatic Collection Data**

such as device identifiers, IP addresses, geolocation, and user preferences are collected via cookies and similar technologies.

Purpose and use of personal data

The Company processes personal data for the following purposes:

- *Fulfilling contractual obligations.*
- Complying with legal and regulatory requirements.
- Improving website functionality and personalizing user experiences.
- Marketing and promotional communications with consent.
- Recruitment, employment, and operational management.
- Conducting analytics and research.

Specific purpose and Data Elements

Purpose	Data Collected
Employee Registration	Name, Email, Contact Number, Address
KYC Compliance	Identification Proof and Tax ID
Billing and Payments	Billing Address and Credit card details
Customer Support	Name, Contact Details, Nature of Enquiry

6.05 Consent

JBS shall obtain consent in writing through consent form regarding purpose of usage before collection of such information.

6.06 Sharing or Disclosure

JBS does not share users' personal data with any third party that intends to use it for direct marketing purposes, unless users have provided specific consent in relation to this.

JBS may share users' personal data with third parties for other purposes, but only in the following circumstances:

a) Affiliates

JBS may provide users' personal data to its affiliates or related companies for legitimate business purposes. JBS may share users' Information with third parties under a confidentiality agreement which inter alia provides for such third parties not disclosing the Information further unless such disclosure is for the Purpose.

JBS shall not publish sensitive personal data or information.

JBS may transfer sensitive personal information including any information, to any other body corporate or a person in India or located in any other country during the course of its business, that ensures the same level of data protection that is adhered to by JBS.

The transfer may be allowed only if it is necessary for the performance of the lawful contract between JBS and provider of information or where such person has consented to data transfer.

b) Third Party Service providers

JBS may engage service providers, agents or contractors to provide services on its behalf, including administering JBS Sites and services available to users. These third parties may come to access or otherwise process users' personal data in the course of providing these services.

JBS may require third parties, who may be based outside the country, to comply with all relevant data protection laws and security requirements in relation to users' personal data, usually by way of a written agreement. In some instances, there is a possibility that such data is transferred from one location to another. Such storage and transfers are undertaken with utmost care and attention. We contractually bind the service providers to store or transfer users' information in a confidential manner, and they are made to treat the data only according to relevant privacy laws of the land.

c) Legal requirements and business transfer

JBS may disclose users' personal data if it is required to do so by law or if, in JBS's good faith judgment, such legal disclosure is reasonably necessary to comply with legal processes or respond to any claims.

In the event of a full or partial merger with, or acquisition of all or part of JBS by another company, the acquirer would have access to the information maintained by that JBS business, which could include personal data.

d) Regulatory Requirements

JBS or any person on its behalf shall provide personal information of the users where the disclosure is necessary for compliance of a legal obligation.

Information shall be shared, without obtaining prior consent from the provider of information, with Government agencies mandated under the law to obtain information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences.

JBS will act upon a request in writing received from the Government agency which states clearly the purpose of seeking such information and also states that the information obtained shall not be published or shared with any other person.

Notwithstanding anything contained above, any sensitive personal data on Information shall be disclosed to any third party by an order under the law for the time being in force.

6.07 Data Security

JBS shall implement security practices and standards and have a comprehensive documented information security program and information security policies that contain managerial, technical, operational and physical security control measures. Such as

The international standard ISO 27001 on "Information Technology - Security Techniques - Information Security Management System - Requirements" is one such standard that will be referred.

We implement robust measures to protect personal data, including:

- **Encryption:** AES-256 for sensitive data.
- **Access Controls:** Adhering to RBAC and least privilege principle and Restricted access based on role and necessity.
- **Audits:** Regular security assessments and compliance reviews.
- **Incident Response:** Procedures to address potential data breaches promptly.

JBS strives to ensure the security of users Personal Information and to protect the same against unauthorized access or unauthorized alteration, disclosure or destruction.

For this purpose, JBS adopts internal reviews of data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems.



Each of the JBS entity shall adopt reasonable security practices and policies as mandated under applicable laws for the protection of users Information. Users hereby confirm to waive their right to claim damages and release all JBS entities from any claim of damages under contract.

It may be noted that these protections do not apply to personal data users choose to share in public areas such as on community websites.

Notwithstanding anything contained in this Policy or elsewhere, JBS and its entities shall not be held responsible for any loss, damage or misuse of users Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event (as defined below).

A "Force Majeure Event" shall mean any event that is beyond the reasonable control of JBS and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, terrorism, acts of government, government authority, computer hacking, unauthorized access to computer, computer system or computer network, computer crashes, breach of security and encryption (provided beyond reasonable control of JBS), power or electricity failure or unavailability of adequate power or electricity.

While JBS will Endeavour to take all reasonable and appropriate steps to keep secure any Personal Information which JBS hold about users and prevent unauthorized access, users acknowledge that the internet or computer networks are not fully secure and that JBS cannot provide any absolute assurance regarding the security of users Personal Information.

6.08 Retention

JBS will only retain users' personal data for as long as it is necessary for the stated purpose and comply with legal requirements under applicable laws

After the retention period, data will be securely deleted or anonymized

6.09 Review (access) and Correction

JBS shall permit the providers of information, as and when requested by them, to review the information they have provided and ensure that any personal information or sensitive personal information found to be inaccurate or deficient shall be corrected or amended as feasible.

6.010 Transparency

7.0 Privacy Rights

Under the DPDP Act 2023, you have the following rights:

- **Access:** Request a copy of your personal data.
- **Rectification:** Correct inaccuracies.



- **Erasure:** Request deletion of data no longer required.
- **Restriction:** Limit processing of your data.
- **Withdrawal of Consent:** Revoke consent at any time.

To exercise these rights, contact [dpo@jalsonsolutions.com].

Requests will be processed within [30 days] or as required by law.

8.0 Governing Law and Jurisdiction

The terms and conditions of this Policy shall be governed by Indian Law DPDP act, GDPR, HIPAA and the courts shall only have exclusive jurisdiction to resolve any disputes.

9.0 Feedback and Concerns

JBS is committed to safeguarding the personal information that is collected and handled.

In case of any feedback or concern regarding personal information, the same can be directed to the Company nominated Privacy Grievance Officer/DPO

10.0 Contact Information

For questions or concerns, please contact:

Data Privacy Officer

Jalson Business Solutions LLP

Email: dpo@jalsonsolutions.com

Review & Approval

Name	Title	Role	Review Date
Rajkumar Vij	QMS Specialist	Reviewer	24-Jun-2026
Dhvanil Karia	Director	Approver	10-Jul-2026