



20 May, 2025

Privacy Policy

iMocha is engaged in the business of providing services to various corporates, which help them evaluate their existing employees or evaluate and recruit any prospective employees. iMocha recognizes the importance of privacy. In this policy document ("Privacy Policy"), we describe how we collect, use, handle, process and disclose personal information. Such personal information may relate to the users of our website or the Prospective Employee/Employees of our customers.

Definitions:

"iMocha", "iMOCHA INC", "we", "us", or "our" shall refer to the iMocha group of entities, which includes iMocha Inc. and all of its subsidiaries.
(Tecknack Technologies Pvt. Ltd)

"Prospective Employee/Employees" shall mean the candidates applying for jobs with the Customers and/or the employees of the Customer who are evaluated through the Services provided by iMocha.

"Customer/s" shall refer to the corporates that avail the Services of iMocha.

"Services" shall mean the services provided by iMocha.

"Site" shall mean www.imocha.io

"User/s" shall mean those who visit the Site, contact us through the



Contact Us option or provide their details and sign up for an account or Services on the Site.

“you”, “your” shall mean the User or the Customer depending on the context.

Your use of our Site or Services, and any dispute over privacy, is subject to this Privacy Policy and the Terms of Service available on our Site.

Please read this Privacy Policy carefully

GDPR

For residents of the EU, please note that this Privacy Policy has been updated in accordance with the requirements of the EU General Data Protection Regulation (“GDPR”).

As a data subject, you will have the following rights:

Access: You may request a copy of your personal data that we process.

Data portability: You may request to obtain the personal data that you have provided to us or to have said data transferred to a third party in a structured, commonly used and machine-readable format.

Erasure: You may demand that we erase all of your personal data unless we are required by law to keep the data for a certain period of time.



Information: You are entitled to receive information concerning which categories of your personal data that We process and how they are processed.

Objection: You may object to our use of your personal data for the purpose of direct marketing, including profiling for direct marketing purposes. You may also object to being subject to a decision based solely on automated processing, including profiling, which produces legal effects that significantly affect you.

Rectification: You may require your personal data to be rectified or supplemented.

Restriction: You may request that we restrict the processing of your personal data.

iMocha's GDPR Commitment is available at <https://www.imocha.io/security/gdpr> is to be considered as the part and parcel of this Privacy Policy.

California Residents Specific Rights

To the extent you are a 'consumer' as defined under the California Consumer Privacy Act of 2018 ("CCPA") and iMocha (iMocha Inc) is a 'business' as defined under CCPA, the following applies to you:

Subject to the provisions of the CCPA, you have the right to request in the manner provided herein, for the following:

A. Right to request for information about the:

- Categories of Personal Data iMocha has collected about you.
- Specific pieces of Personal Data iMocha has collected about you.
- Categories of sources from which the Personal Data is collected.
- Business or commercial purpose for collecting Personal Data.
- Categories of third parties with whom the business shares Personal Data.

B. Right to request for deletion of any Personal Data collected about you by iMocha. If you seek to exercise the foregoing rights to access or delete Personal Data which constitutes 'personal information' as defined in CCPA, please contact us at support@imocha.io We respond to all requests we receive from you wishing to exercise your data protection rights within a reasonable timeframe in accordance with applicable data protection laws. By writing to us, you agree to receive communication from us seeking information from you in order to verify you to be the consumer from whom we have collected the Personal Data from and such other information as reasonably required to enable us to honor your request. We understand that when you use iMocha's platform you are placing your trust in us to handle your data appropriately, including the personal information of you and your end users (employees and candidates). That is why we have a simplified privacy policy that will help you know what happens to your data, how we process it and how we use.

EU-US Data Privacy Framework



iMocha complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. iMocha has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S.DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

In compliance with the EU-U.S. DPF, iMocha commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF.

Individuals have certain rights (e.g. to obtain access to their data, or obtain correction or deletion of incorrect or unlawfully handled data). Under certain conditions, an individual has the option to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Please see [Annex I](#) to the DPF Principles for additional information.

The Federal Trade Commission has jurisdiction over iMocha's compliance with the EU-U.S. DPF. All the processing activities of iMocha under DPF are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).



iMocha has responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on its behalf. iMocha shall remain liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

Let's get oriented

iMocha processes two broad categories of personal information when you use our services:

- Your personal information as a customer (or potential customer) of iMocha's services — information that we refer to as Customer Account Data, and
- The personal information of your end users (employees or candidates) who you invite to appear for the assessments — Customer Usage Data

How iMocha Processes Your Personal Information

Data protection laws and privacy laws in certain jurisdictions, like the European Economic Area (EEA), differentiate between "controllers" and "processors" of personal information. A controller decides why and how to process personal information.

A processor processes personal information on behalf of a controller based on the controller's instructions. When iMocha processes your Customer AccountData, the iMocha entity with whom you are contracting is acting as a controller. When we process the information



on your behalf (employee and candidate data), you are the controller and iMocha is the processor.

Broadly speaking, we use Customer Account Data to further our legitimate interests to:

- Understand who our customers and potential customers are and their interests in iMocha's product and services,
- Fulfil our contractual obligations to the Customer
- Manage our relationship with you and other customers,
- Carry out core business operations such as accounting, filing taxes, and fulfilling regulatory obligations and
- Help detect, prevent, or investigate security incidents, fraud and other abuse and/or misuse of our products and services.

What Personal Information iMocha collects

While we're on the subject of Customer Account Data and Customer Usage Data, we'd like to give you a brief summary of the categories of personal information that might be found in the Customer Account Data and Customer Usage Data that we collect from our customers and their end users, so you can know at a glance what we're talking about.

Customers or visitors

If you interact with our services, Sites or emails, we automatically collect information about your device and your usage of our services, Sites or emails (such as Internet Protocol (IP) addresses or other identifiers,



which may qualify as Personal Data. With regard to each of your visits to our Site or use of our services we may automatically collect the following information using common information-gathering tools, such as cookies, web beacons, pixels, and similar technologies about your device, and your use of our Site.

- Technical information: including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit: including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information from other online accounts: where you have given us permission to collect data from within your settings or the privacy policies of these other online services: For example, this can be via social media or by choosing to send us your location data when accessing our Site from your smartphone; or it can be from the integrations and connections that you choose to install when using the Site
- To create an account on iMocha, customers are required to provide their Full Name and email address

Information we receive from other sources. We may receive information about you if you use any of the other websites we operate

or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Site.

Information we collect from other sources. We also collect information about you from publicly available sources. We may combine this information with personal data provided by you. This helps us update, expand, and analyse our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. We also use this for the purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying contact information.

The Personal Data we collect includes:

- **Publicly available information about you:** such as information published about you, for example by Companies House, including job title, email address, phone number, professional or employment-related information, education information and commercial information.
- **Internet activities:** internet data (or user behavioural data), IP addresses, internet activity information and inferences about your preferences and behaviour.
- **Social media profiles:** information published about you on social media profiles such as LinkedIn, Facebook, Twitter etc.

Information collected by third parties. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks,



analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

- **HubSpot:** to collect information about customer tickets (for support and development purposes) and for marketing communication (Newsletter / Product Updates) and webforms (Webinars, events etc)
- **Sendgrid:** to enable email communications within iMocha platform. E.g., sending assessment invitation
- **Microsoft Application Insights:** to collect error logs to help identify and remediate issues.
- **Google Analytics and Mixpanel:** to collect analytics data to help us improve our product.

Candidates(Potential candidates or employees taking the assessment)

- Technical information: including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Candidates are required to provide their Full name and email address to appear for the iMocha assessment
- Photos and Videos from proctored tests: for candidates taking proctored tests, periodic webcam snapshots are taken which usually contain a photo of your face.

Cookies



We use cookies on our Site to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve the Site. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the Site. We use persistent cookies and session cookies on our Site. We use persistent cookies to save your login information for future logins to the Site. We use session cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you logoff from the Site and then close your browser.

You can set up your browser options, to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or all of the services.

How we use the personal information

We use information held about you in the following ways.

Information you give to us. We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

- To provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about products and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the [order form OR registration form]);
- To notify you about changes to our service;
- To notify you about changes to our service;
- To ensure that content from our Site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- To administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our Site to ensure that content is presented in the most effective manner for you and your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;



- As part of our efforts to keep our Site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To monitor your use of the Site is in compliance with any legal agreement we have in place;
- To make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them.

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We will not sell or rent your personal data to anyone.

Disclosure of Your Information

Information we share with third parties. We may share your information with selected third parties including:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you to provide services such as IT and system administration, email communications, hosting services, backup services, credit card

processing, research, development, marketing and customer support, including: Google, Microsoft, HubSpot, Sendgrid, Mixpanel.

- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 250 women aged over 25 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, men living in London). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimization of our Site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- We may share anonymous and aggregated usage data and reports in the normal course of operating our business; for example, we may share information with other Site users, our customers or publicly to show trends or benchmark the general use of our Site.

Information we disclose to third parties. We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If iMocha Inc or Tecknack Technologies Pvt. Ltd. sells or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and/or any other agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Where We Store Your Personal Data

iMocha is hosted on Microsoft Azure with our primary data center in Virginia, USA. The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") or the UK. It may also be processed by staff operating outside the EEA or the UK who work for us or for one of our suppliers or partners. Such staff or subcontractors may be engaged in, among other things, the fulfilment of your order, the processing of your payment details or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the EEA or the UK.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred to



a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clause according to conditions provided by the European Commission ("Standard Contractual Clauses").

Our Site is accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site from outside the EEA or the UK. This means that where you chose to post your data on our Site, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA or the UK may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

Our employees in India may access Your personal data in connection with updates, support or any software enhancement. You acknowledge that we may transfer your personal data for the aforementioned purposes to the following processors:

Tecknack Technologies Pvt. Ltd.

CIN U72900PN2019FTC182997

1st Floor, Unit 102, F.P. No. 246, CTS 18/18/1, Bund Garden Road, Landmark-
Manikchand Icon, Pune 411001, Maharashtra, India

Links to Other Websites

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Your Rights

You have the right under Data Protection Law, free of charge, to request:

As a customer

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- Withdraw your consent to us processing your personal data, at any time.

As a data subject (candidates) you can write to the controller (test administrator) to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.



- A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- Withdraw your consent to us processing your personal data, at any time.

You can make a request in relation to any of the above rights by writing to us at the contact address given at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of Data Protection Law.

Marketing Communications

We will send you marketing emails if you “opt in” to receive marketing emails when registering on our Site, or if you have enquired about, or purchased any of our goods or services.

Please note that if you change your mind about being sent marketing emails you can opt out at any time by clicking the “unsubscribe” link at the bottom of any marketing email from us and we will remove you from our mailing lists. We will continue to communicate with you regarding your service billing and support via email.

We send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

Data Retention



We retain personal data for as long as necessary for the relevant activity for which it was provided or collected. This will be for as long as we provide access to the Site to you, your account with us remains open or and period set out in any relevant contract you have with us. However, we may keep some data after your account is closed or you cease using the Site for the purposes set out below.

After you have closed your account, or ceased using the Site for a period of at-least 37 months, we usually delete personal data, however we may retain personal data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our Terms and Conditions, or fulfil your request to "unsubscribe" from further messages from us.

We will retain de-personalized information after your account has been closed.

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other users may have copied from the Site. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

Complaints

If you have any complaints about our use of your personal data please contact our DPO, Mr. Nishant Thool at dpo@imocha.io or your local data protection supervisory authority.



Age of Users

This Site is not intended for and shall not be used by anyone under the age of 16years.

Changes to Our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy was last updated on March 10, 2025 and replaces any other Privacy Policy previously applicable from this date.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

Email: support@imocha.io