

PRIVACY POLICY

CareerBay (a product of MM Enterprises) | www.careerbay.in

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1. INTRODUCTION

CareerBay ("we," "us," "our," or the "Platform"), a product of MM Enterprises (Sole Proprietorship), operates the website www.careerbay.in and provides career advancement tools and services (collectively, the "Services"). This Privacy Policy explains how we collect, use, store, share, and protect your personal data when you access or use our Platform.

Our Services include subscription-based tools such as LinkedIn Reviewer, LinkedIn Builder, Resume Reviewer, Resume Builder, and Remote Job listings, as well as pay-per-use expert services including Expert Resume Writing, Expert LinkedIn Writing, and Expert Career Consultation. Additional products may be introduced from time to time.

MM Enterprises is a sole proprietorship registered in India. We serve users globally, and this Policy is designed to comply with the Digital Personal Data Protection Act, 2023 (India) ("DPDP Act"), the General Data Protection Regulation (EU) ("GDPR"), the California Consumer Privacy Act ("CCPA"), the Children's Online Privacy Protection Act (US) ("COPPA"), and other applicable data protection laws.

By accessing or using the Platform, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree, please discontinue use of the Platform immediately.

2. DEFINITIONS

- **"Personal Data"**: means any data about an individual who is identifiable by or in relation to such data, as defined under the DPDP Act, and includes "personal information" under the CCPA and "personal data" under the GDPR.
- **"Data Principal" / "Data Subject" / "User"**: means the individual to whom the personal data relates, i.e., you.
- **"Data Fiduciary" / "Data Controller"**: means CareerBay (MM Enterprises), which determines the purpose and means of processing your personal data.
- **"Data Processor"**: means any entity that processes personal data on behalf of CareerBay.
- **"Processing"**: includes collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, use, disclosure, dissemination, restriction, erasure, or destruction of personal data.
- **"Sensitive Personal Data"**: includes financial data, biometric data, health data, and data revealing racial or ethnic origin, political opinions, or religious beliefs.
- **"Child"**: means a person below the age of 18 years under the DPDP Act, or below 13 years under COPPA, as applicable.

3. DATA WE COLLECT

3.1 Information You Provide Directly

- **Account Information:** Full name, email address, mobile number, and password (hashed and encrypted).
- **Professional Information:** Work experience, education, skills, job preferences, industry, career goals, and other professional details you provide to personalize your experience.
- **Resume Data:** Resumes and curriculum vitae you upload or create using our tools, including all content therein (employment history, qualifications, certifications, contact details).
- **LinkedIn Data:** LinkedIn profile URLs, profile content, and related information you submit for review or optimization.
- **Payment Information for Referral Withdrawals:** UPI ID, bank account number, IFSC code, and beneficiary name, collected solely for processing referral reward payouts.
- **User Inputs:** Responses to questionnaires, preferences, consultation notes, and any other content you provide through the Platform.
- **Communications:** Records of correspondence when you contact our support team.

3.2 Information Collected Automatically

- **Device and Browser Information:** IP address, browser type and version, operating system, device identifiers, screen resolution, and language preferences.
- **Usage Data:** Pages visited, features used, clickstream data, session duration, referring URLs, and interaction patterns.
- **Log Data:** Server logs including access times, error logs, and system activity.
- **Cookies and Tracking Technologies:** See Section 9 (Cookie Policy) below.

3.3 Information from Third Parties

We may receive information from third-party services you connect to your account (e.g., LinkedIn via authorized API access), payment processors (transaction confirmations from Razorpay or Stripe), and analytics providers.

4. HOW WE USE YOUR DATA

4.1 Legal Bases for Processing

We process your personal data on the following legal bases:

- **Consent:** Where you have given explicit consent for specific processing activities (e.g., AI-powered analysis of your resume, marketing communications).
- **Contractual Necessity:** To perform our obligations under the Terms of Service, including providing the Services you have subscribed to.
- **Legitimate Interests:** For purposes such as improving our Services, fraud prevention, and platform security, where such interests are not overridden by your fundamental rights.
- **Legal Obligation:** Where processing is necessary for compliance with applicable laws, regulations, or lawful government requests.

4.2 Purposes of Processing

- To create, maintain, and authenticate your account.
- To provide, personalize, and improve our Services, including resume building and review, LinkedIn profile optimization, job matching, and career consultation.
- To process referral reward withdrawals to your designated UPI or bank account.

- To power AI-driven features (see Section 5).
- To communicate with you regarding your account, service updates, and customer support.
- To send marketing and promotional communications (only with your consent; you may opt out at any time).
- To analyze usage patterns and improve Platform performance, functionality, and user experience.
- To detect, prevent, and address fraud, security breaches, and technical issues.
- To comply with applicable legal obligations, including tax and regulatory requirements.

5. ARTIFICIAL INTELLIGENCE AND AUTOMATED PROCESSING

At CareerBay, we have invested significant effort in building and training our AI tools to deliver high-quality, recruiter-grade feedback and content. Our AI agents are carefully developed and continuously improved by our team to give you the best possible career support. Here is how AI works on our Platform:

- **AI Analysis:** Our AI reviews your resumes, LinkedIn profiles, and other submitted content to provide scores, feedback, and actionable suggestions for improvement. We have trained our AI to think and evaluate the way experienced recruiters do, so the insights you receive are practical and relevant.
- **AI Content Generation:** Our AI can help you draft or rewrite resumes, cover letters, and LinkedIn summaries based on your inputs and professional details. The goal is to save you time and help you put your best foot forward.
- **Expert (Human) Services:** If you prefer a personal touch, our Expert Resume Writing, Expert LinkedIn Writing, and Expert Career Consultation services are handled by in-house professionals who manually craft and review your materials.
- **Continuous Improvement:** We are constantly training and refining our AI to improve accuracy and relevance. That said, like any AI system, there is always some scope for errors or imperfections. We encourage you to review all AI-generated content before using it, as the final responsibility for how you use the output rests with you.
- **Data Used for AI:** Your personal data, resumes, and profile content are processed by our AI systems powered by third-party AI infrastructure providers (including OpenAI and AWS). We have data processing agreements in place with these providers. Your data is not used to train third-party AI models unless you explicitly consent to it.
- **Your Choice:** You are never required to use AI-powered features. You can always opt for our expert (human) services, or use a combination of both.

6. DATA SHARING AND DISCLOSURE

We do not sell your personal data. We may share your data in the following circumstances:

6.1 Service Providers (Data Processors)

- **Payment Processors:** Razorpay and Stripe, for processing subscription payments and referral reward payouts.
- **Cloud Infrastructure:** Amazon Web Services (AWS) for hosting, storage, and computing.
- **AI Services:** OpenAI for powering AI-driven features.
- **Analytics:** Google Analytics for understanding Platform usage and performance.
- **Email and Marketing:** Email service providers (e.g., Mailchimp or equivalent) for transactional and marketing communications.

All service providers are bound by data processing agreements requiring them to process your data solely on our instructions and in accordance with applicable data protection laws.

6.2 Future Data Sharing with Employers and Recruiters

In the future, we may introduce features that share your profile, resume, or professional data with prospective employers, recruiters, or hiring partners to help you receive job offers and opportunities. **Such sharing will only occur with your prior explicit, informed, and freely given consent.** You will be presented with a separate consent mechanism before any such sharing occurs, and you will have the right to withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

6.3 Legal and Regulatory Disclosures

We may disclose your personal data if required to do so by law, regulation, legal process, or governmental request, or where we believe in good faith that disclosure is necessary to protect our rights, your safety, or the safety of others, investigate fraud, or respond to a government request.

6.4 Business Transfers

In the event of a merger, acquisition, reorganization, bankruptcy, or sale of all or a portion of our assets, your personal data may be transferred as part of that transaction. We will notify you via email and/or a prominent notice on the Platform of any change in ownership or uses of your personal data.

7. INTERNATIONAL DATA TRANSFERS

CareerBay is based in India and serves users globally. Your personal data may be transferred to, stored, and processed in countries outside your country of residence, including India and the United States, depending on the location of our service providers. By using the Platform, you consent to the transfer of your data to India and other jurisdictions where our service providers operate.

- **For Indian Users:** Transfers are governed by the DPDP Act and any rules notified by the Central Government regarding cross-border transfers. We will only transfer data to jurisdictions not restricted by the Government of India.
- **For All International Users (including EU/EEA):** Your data is primarily stored and processed in India. We take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy. By using the Platform, you acknowledge that your data will be transferred to and processed in India, which may have different data protection standards than your home jurisdiction. All disputes, complaints, and legal proceedings related to data processing are governed exclusively by Indian law and the jurisdiction of courts in Hyderabad, Telangana, India (see Section 15).

8. DATA RETENTION

- **Account Data:** Retained for as long as your account is active. Upon account deletion, your data will be deleted or anonymized within 90 days, except where retention is required by law.
- **Financial/Payment Data:** UPI and bank account details for referral payouts are retained for the duration of your account and thereafter as required under applicable tax and financial regulations (typically 7 years under Indian tax law).
- **Resume and Professional Data:** Retained for the duration of your account. Deleted upon account deletion unless you have consented to sharing with recruiters, in which case shared data may persist with the recipient subject to their own privacy policy.

- **Usage and Analytics Data:** Retained in anonymized or aggregated form for up to 36 months for analytical purposes.
- **Legal Compliance:** Where we are required by law to retain data for a specific period, we will do so regardless of account deletion.

9. COOKIE POLICY

We use cookies and similar tracking technologies on our Platform. Cookies are small text files placed on your device that help us provide and improve the Services.

9.1 Types of Cookies We Use

- **Strictly Necessary Cookies:** Essential for the Platform to function (e.g., authentication, session management, security). These cannot be disabled.
- **Performance and Analytics Cookies:** Help us understand how users interact with the Platform (e.g., Google Analytics). These collect anonymized usage data.
- **Functional Cookies:** Remember your preferences and settings to enhance your experience.
- **Marketing and Advertising Cookies:** Used to deliver relevant advertisements and measure campaign effectiveness. These may be set by third-party advertising partners.

9.2 Managing Cookies

Upon your first visit, we display a cookie consent banner allowing you to accept or reject non-essential cookies. You may also manage cookie preferences at any time through your browser settings. Note that disabling certain cookies may affect Platform functionality.

10. CHILDREN'S PRIVACY

CareerBay allows users aged 13 and above to use the Platform. We are committed to protecting the privacy of younger users and comply with applicable child protection laws:

- **Users Aged 13-17 (Under DPDP Act):** Under the DPDP Act, a "child" is a person under 18. We obtain verifiable parental or guardian consent before processing personal data of users under 18. We do not engage in behavioral tracking, profiling, or targeted advertising directed at users we know to be under 18.
- **Users Under 13 (COPPA Compliance):** We do not knowingly collect personal data from children under 13 in the United States without verifiable parental consent. If we learn that we have collected personal data from a child under 13 without appropriate consent, we will take steps to delete such data promptly.
- **No Harmful Processing:** We do not process children's data in any manner that is detrimental to the child's well-being, and we do not serve targeted advertisements to known minors.

11. YOUR RIGHTS

11.1 Rights Under the DPDP Act (Indian Users)

- Right to access information about your personal data being processed.
- Right to correction and erasure of inaccurate or misleading personal data.
- Right to grievance redressal (see Section 15).
- Right to nominate another person to exercise your rights in the event of death or incapacity.

11.2 Rights Under the GDPR (EU/EEA Users)

If you are located in the EU/EEA, applicable data protection regulations may grant you certain rights regarding your personal data, including rights of access, rectification, erasure, restriction of processing, data portability, and the right to object to automated decision-making. To exercise any such rights, please contact us using the details in Section 15. Please note that all disputes and legal proceedings are subject exclusively to Indian jurisdiction as set out in Section 15.

11.3 Rights Under the CCPA (California Users)

- Right to know what personal information is collected, used, shared, or sold.
- Right to delete personal information held by us.
- Right to opt out of the sale of personal information. **We do not sell your personal information.**
- Right to non-discrimination for exercising your CCPA rights.

11.4 How to Exercise Your Rights

To exercise any of the above rights, please contact us at hellocareerbay@gmail.com (or the contact details in Section 15). We will respond to your request within 30 days (or within the timeframe required by applicable law). We may need to verify your identity before processing your request.

12. DATA SECURITY

We implement appropriate technical and organizational security measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction. These measures include:

- Encryption of data in transit (TLS/SSL) and at rest.
- Hashing and salting of passwords.
- Access controls and role-based permissions for internal staff.
- Regular security assessments and vulnerability testing.
- Secure cloud infrastructure with reputable providers (AWS).
- Incident response procedures for data breaches.

However, no method of transmission over the Internet or electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your data, we cannot guarantee its absolute security. In the event of a data breach that affects your personal data, we will notify you and the relevant authorities as required by applicable law.

13. THIRD-PARTY LINKS AND SERVICES

The Platform may contain links to third-party websites, services, or applications (including job listings on external sites). This Privacy Policy does not apply to such third-party services, and we are not responsible for their privacy practices. We encourage you to read the privacy policies of any third-party service before providing your personal data.

14. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. We will notify you of any material changes by posting the updated Policy on the Platform with a revised "Last Updated" date and, where required by law, by sending you an email notification.

Your continued use of the Platform after such changes constitutes your acceptance of the revised Policy. We encourage you to review this Policy periodically.

15. CONTACT INFORMATION AND GRIEVANCE OFFICER

If you have any questions, concerns, or complaints about this Privacy Policy or our data practices, or if you wish to exercise any of your rights, please contact:

- **Data Fiduciary / Controller:** CareerBay, a product of MM Enterprises (Sole Proprietorship)
- **Website:** www.careerbay.in
- **Email:** hellocareerbay@gmail.com
- **Grievance Officer (DPDP Act):** Manish Maryada, reachable at hellocareerbay@gmail.com

For all users worldwide: Any complaints, disputes, or legal proceedings related to this Privacy Policy or our data processing practices are subject exclusively to the jurisdiction of courts in Hyderabad, Telangana, India. For Indian users, you may also file a complaint with the Data Protection Board of India as established under the DPDP Act.

This Privacy Policy was last updated on July 15, 2026. This document is provided for informational purposes and does not constitute legal advice. CareerBay recommends consulting with a qualified legal professional for compliance verification.