

COOKIE POLICY

Digital Personal Data Protection Act, 2023 (DPDPA)

SBS HR

Document Information

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1. Purpose

The purpose of this Cookie Policy is to explain how SBS HR uses cookies and similar tracking technologies on its website and digital platforms.

This policy provides transparency regarding collection of website usage information and supports compliance with the Digital Personal Data Protection Act, 2023 (DPDPA).

All cookie and tracking-related activities shall be implemented in accordance with approved organizational procedures, privacy requirements, security safeguards, and DPDPA obligations.

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2. Scope

This policy applies to:

- Website visitors
- Job applicants using online portals
- Clients and prospects
- Users interacting with SBS HR digital platforms

The policy covers cookies, analytics tools, tracking technologies, and related website mechanisms.

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3. What are Cookies

Cookies are small text files placed on user devices when visiting websites. Cookies help websites function efficiently, remember preferences, improve user experience, and provide analytical insights.

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4. Types of Cookies Used

SBS HR may use:

- Essential cookies
- Functional cookies
- Performance cookies
- Analytics cookies
- Security-related cookies
- Preference cookies
- Session cookies
- Persistent cookies

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5. Purpose of Cookies

Cookies may be used for:

- Website functionality
- Session management
- Security and authentication
- Performance monitoring
- Website analytics
- User preference management
- Improving user experience

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6. Analytics & Tracking Technologies

SBS HR may use analytics and tracking technologies to:

- Understand website usage
- Monitor performance
- Improve services
- Detect security issues
- Generate statistical reports

Such technologies shall be used in accordance with applicable legal and privacy obligations.

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7. Consent for Cookies

Where required, users shall be provided with:

- Cookie banners
- Preference management options
- Consent choices
- Opt-in or opt-out mechanisms

Consent preferences shall be recorded where applicable.

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8. Managing Cookies

Users may manage or disable cookies through:

- Browser settings
- Website preference controls
- Cookie banners
- Device settings

Disabling certain cookies may impact website functionality.

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9. Third-Party Cookies

Third-party service providers may place cookies for:

- Analytics
- Recruitment platforms
- Security monitoring
- Embedded services
- Communication tools

SBS HR shall ensure appropriate controls and agreements with applicable providers.

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10. Information Collected Through Cookies

Cookies may collect:

- IP address
- Browser type
- Device information
- Session information
- Usage statistics
- User preferences
- Website interaction details

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11. Security Controls

SBS HR shall implement reasonable safeguards to protect cookie-related information including:

- Access controls
- Secure configurations
- Logging and monitoring
- Secure hosting
- Periodic reviews

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12. Retention of Cookie Data

Cookie-related information shall only be retained:

- For legitimate business purposes
- According to defined retention periods
- In accordance with legal and regulatory obligations

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13. User Rights

Website users may exercise rights related to:

- Consent withdrawal
- Preference updates
- Data access requests
- Deletion requests
- Privacy-related grievances

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14. Responsibilities

The IT and Compliance Teams shall:

- Maintain cookie mechanisms
- Review tracking technologies
- Monitor compliance
- Manage consent configurations
- Support incident handling

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15. Incident Management

Any suspected or confirmed incidents involving website tracking or cookie-related information shall be reported and handled through approved incident response procedures.

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16. Audit & Monitoring

Cookie-related controls shall be periodically reviewed through:

- Internal audits
- Compliance reviews
- Website assessments

- Security reviews
- Monitoring activities

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17. Policy Updates

This policy may be updated periodically due to:

- Regulatory changes
- Technology updates
- Website enhancements
- Security improvements

Updated versions shall be published through official channels.

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18. Contact Information

For privacy-related concerns, cookie preferences, or questions, users may contact SBS HR through officially published communication channels.

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19. Approval

This Cookie Policy is approved by Top Management and shall be made available on official digital platforms.

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Approval & Authorization

Prepared By	Reviewed By	Approved By	Date
Network Engineer	DPO	Director	April 1'st - 2026