

STATEMENT

DPDP Act 2023 Compliance Statement

How Gradii meets India's Digital Personal Data Protection Act, 2023 and the DPDP Rules, 2025, as a Data Processor for employers and a Data Fiduciary for its own customers.

VERSION	EFFECTIVE	OWNER	REVIEW	CLASSIFICATION
1.0	9 October 2026	Grievance Officer	Every six months, and when the DPDP Rules change	Public

Our role under the Act

The Digital Personal Data Protection Act, 2023 ("the Act") separates the party that decides why and how personal data is processed (the **Data Fiduciary**) from the party that processes it on that party's behalf (the **Data Processor**).

Data	Gradii's role	Who decides
Candidate data that employers process through Gradii: applications, resumes, interviews, scores, background checks	Data Processor	The employer (our customer) is the Data Fiduciary
Data about our customers' users: recruiter accounts, billing contacts, usage	Data Fiduciary	Gradii
Website visitors and people who contact us	Data Fiduciary	Gradii

As a Data Processor, Gradii processes candidate data only on the employer's documented instructions, under our [Data Processing Addendum](#). We help employers meet their own obligations to candidates.

Commencement

The DPDP Rules, 2025 were notified on 13 November 2025. They take effect in three phases: the Data Protection Board provisions immediately, consent-manager provisions after one year, and most obligations on Data Fiduciaries 18 months after notification. Gradii is implementing those obligations now rather than waiting for the final phase. This statement describes where we stand today.

How we meet the core obligations

Notice and consent (Sections 5–6)

- Before any background check runs, the candidate sees a notice describing what will be checked, by whom and why, and gives consent. The consent is recorded with a timestamp.
- Government-issued documents are fetched only through DigiLocker. The candidate signs in to DigiLocker and chooses what to share. DigiLocker requests are recorded in an audit log.
- Interview recording is shown on screen throughout every recorded interview.
- Consent can be withdrawn. Withdrawal stops further processing for that purpose. It does not affect processing already completed lawfully.

Purpose limitation and data minimisation

- Each background check collects only the identifiers that check needs. For example, a bank-account check needs an account number and IFSC, and nothing else.
- Gradii does not use candidate data for its own purposes, including advertising or training foundation models.

Accuracy (Section 8(3))

Candidates can ask the employer, or Gradii through the employer, to correct inaccurate data. AI scores are recorded together with their inputs, so an employer can review how a score was reached.

Reasonable security safeguards (Section 8(5))

Gradii's safeguards include: encryption in transit (TLS 1.2+) and at rest (AES-256); hosting of all primary data stores in India; role-based access; two-factor authentication and SSO; key-only server access; logging of security-relevant events; and tamper-evident hashing of interview recordings. The [Security & Privacy Overview](#) describes them in full.

Breach notification (Section 8(6) and Rule 7)

If Gradii becomes aware of a personal-data breach:

- **As a Data Processor**, we notify the affected employer without undue delay, so the employer can meet its own duty to inform the Board and the affected candidates.
- **As a Data Fiduciary**, we inform the Data Protection Board of India without delay, and file the detailed report within **72 hours**. We also inform each affected person in plain language: what happened, the likely consequences, what we have done, and what they can do.
- Where the incident is also a cyber security incident reportable under the CERT-In Directions of 28 April 2022, we report it to CERT-In within **six hours**.

Retention and erasure (Section 8(7))

Data is kept only as long as its purpose requires. Retention periods are defined in our Data Retention & Deletion Policy, and the key periods are enforced by nightly jobs. When an employer closes its workspace, or asks us to delete a candidate, we erase the data from the live systems. Backups age out on the provider's backup cycle.

Data Principal rights (Sections 11–14)

People can ask for a summary of their data, correction, completion, updating or erasure. They can also nominate another person to act for them. For candidate data, the request goes to the employer. If it reaches Gradii, we pass it on and help the employer respond. For data where Gradii is the Fiduciary, we respond directly.

We aim to respond within 30 days. We will follow any shorter period the Rules set once they are in force.

Children's data (Section 9)

Gradii is a hiring platform for adults and does not knowingly process the personal data of anyone under 18. If we learn that we have, we delete it.

Cross-border transfer (Section 16)

Gradii stores customer and candidate data in India. Some AI and communication sub-processors process data outside India to perform their service. Each one is listed, with its location, in our public Sub-processor List. We will follow any restriction the Central Government notifies under Section 16.

Grievance redressal

Grievance Officer	Himanshu P Bohra
Email	team@gradii.ai (subject: "Grievance")
Post	Manjari Technologies Private Limited, 316, Neelkanth Corporate Park, Vidyavihar West, Mumbai, Maharashtra, India
Response target	Acknowledgement within 3 business days; resolution within 30 days

If you are not satisfied with our response, you may complain to the Data Protection Board of India once its complaints process is open.

Significant Data Fiduciary

The Central Government has not notified Gradii as a Significant Data Fiduciary. If it does, we will appoint a Data Protection Officer based in India and carry out the periodic audits and impact assessments that the Act requires.

Manjari Technologies Private Limited ("Gradii") · 316, Neelkanth Corporate Park, Vidyavihar West, Mumbai, Maharashtra, India · gradii.ai/trust-vault

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