

PRIVACY POLICY

Effective Date: August 03, 2026

This Privacy Policy ("Policy") governs the processing of personal data collected by **DAYL Group, LLP** ("TUT STAFF", "Company", "we", "us", or "our"), a company legally incorporated under the laws of the Republic of Kazakhstan, through our website located at **tutstaff.com** (the "Site") and in connection with our B2B IT talent matching, candidate anonymization, and outstaffing services (collectively, the "Services").

We respect your privacy and are committed to protecting the personal data of our website visitors, B2B clients, candidates, independent contractors, and business partners ("User", "you", or "your").

Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will treat it. By accessing our Site, utilizing our Services, or submitting any information to us, you acknowledge that you have read and understood the terms of this Privacy Policy.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

For the purposes of applicable data protection legislation (including the EU General Data Protection Regulation 2016/679 - "GDPR" and the Kazakhstani Law "On Personal Data and Its Protection"), the Data Controller is:

DAYL Group, LLP

Republic of Kazakhstan

Website: <https://tutstaff.com>

If you have any questions, concerns, or requests regarding the processing of your personal data or this Policy, please contact our Data Protection Officer/Privacy Administrator at mary.b@tutstaff.com.

2. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect personal data directly from you, automatically through your interaction with our Site, and from legitimate third-party sources (such as professional social networks).

A. Information Provided Directly by You

- **Client & Business Partner Representatives:** Full name, business email address, job title, company name, phone number, physical corporate address, billing details, and specific project/technical requirements communicated during discovery calls or via contact forms.

- **Candidates & IT Specialists (Talent Pool):** Full name, personal email address, phone number, location/time zone, educational background, professional work experience, technical skill matrix, hourly rates, code repository links (e.g., GitHub, GitLab), portfolio links, and original CV/Resume files.
- **Communication Data:** Inquiries, feedback, responses to questionnaires, scheduling data (e.g., via Calendly or Google Calendar integrations), and correspondence sent via web forms, email, or direct messaging platforms (Telegram, WhatsApp, LinkedIn).

B. Information Collected Automatically

- **Technical & Usage Data:** IP address, geographic location (country/city level), browser type and version, operating system, referrer URL, device identifiers, page views, clickstream data, time spent on specific pages, and system performance metrics.
- **Cookies and Tracking Technologies:** Information gathered via essential, functional, and analytical cookies (for detailed information, see Section 10 below).

C. Information Collected from Third Parties

- **Public & Professional Networks:** We may collect publicly available professional information (such as LinkedIn profile data, public GitHub activity, and corporate directory listings) for B2B outreach, lead generation, and candidate sourcing purposes.

3. PURPOSES AND LEGAL BASES FOR DATA PROCESSING

We process your personal data only when we have a valid legal basis to do so under GDPR and applicable data protection laws:

Purpose of Processing	Categories of Data	Legal Basis (GDPR Art. 6)
Providing & Managing Services: Matching candidates with B2B clients, issuing B2B contracts (MSA/SOW), processing payments.	Client details, Candidate CVs, Billing info.	Contract Performance (Art. 6(1)(b))
CV Anonymization & Showcase: Stripping direct PII from developer profiles to generate standardized B2B showcases.	Professional experience, Skills, Anonymized ID.	Legitimate Interest (Art. 6(1)(f))

Direct B2B Outreach & Marketing: Sending targeted B2B proposals, bench updates, and industry insights to corporate leads.	Corporate email, Job title, LinkedIn URL.	Legitimate Interest (Art. 6(1)(f)) or Consent (Art. 6(1)(a))
Site Optimization & Security: Monitoring network integrity, preventing fraud, analyzing site performance.	IP address, Log data, Cookies.	Legitimate Interest (Art. 6(1)(f))
Legal Compliance: Fulfilling statutory accounting, tax, and reporting obligations under Kazakhstani and international law.	Invoices, Contracts, Transaction history.	Legal Obligation (Art. 6(1)(c))

4. CV ANONYMIZATION AND TALENT SHOWCASE PRACTICE

A core component of TUT STAFF's Services is our proprietary candidate evaluation and presentation workflow:

1. When candidates submit their CVs/resumes, TUT STAFF processes the original files.
2. Before presenting any candidate profile to prospective B2B clients, we run the file through an anonymization process to redact direct Personally Identifiable Information (PII) — including full names, personal phone numbers, home addresses, personal email addresses, links to personal social media, and exact previous employer names where requested.
3. The resulting document is branded under the **TUT STAFF** identity with a unique anonymized identifier (Candidate ID).
4. Full unredacted candidate credentials and direct contact details are disclosed to clients **only** after an explicit agreement or Non-Disclosure Agreement (NDA) / Service Agreement is executed.

5. DATA SHARING AND DISCLOSURE

We do not sell, rent, or trade your personal data to third parties. We share your information strictly on a need-to-know basis under the following circumstances:

- **Prospective and Active B2B Clients:** Anonymized candidate profiles are shared with potential clients for technical evaluation. Complete professional credentials are provided once an interview or engagement is initiated.

- **Third-Party Service Providers (Data Processors):** We engage trusted vendor services to support our operations, subject to strict Data Processing Agreements (DPAs):
 - Infrastructure and cloud storage providers (e.g., Google Workspace, AWS, Spaceship).
 - Customer Relationship Management (CRM) and database management tools (e.g., Notion API, Airtable).
 - Email delivery and communication tools.
 - Analytics providers (e.g., Google Analytics).
- **Corporate Transactions:** In the event of a merger, acquisition, reorganization, insolvency, or sale of company assets, your data may be transferred as part of the business assets.
- **Legal and Regulatory Disclosures:** We may disclose your data if required to do so by law, court order, subpoena, or governmental request in the Republic of Kazakhstan or international legal jurisdictions, or to enforce our contractual terms and protect company rights.

6. INTERNATIONAL DATA TRANSFERS

TUT STAFF is headquartered in the Republic of Kazakhstan and operates internationally, servicing clients across the European Union, the United Kingdom, the United States, the United Arab Emirates, and other regions.

Your personal data may be transferred to, stored, or processed in locations outside your country of residence where data protection laws may differ from those in your jurisdiction. When transferring personal data outside the European Economic Area (EEA) or UK, we ensure adequate safeguards are implemented, including:

- Transferring data to countries recognized as providing an adequate level of protection by the European Commission.
- Incorporating **Standard Contractual Clauses (SCCs)** approved by the European Commission into our contracts with third-party service providers.

7. DATA RETENTION

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, as outlined in this Policy, or as required by statutory law:

- **Client Data:** Retained for the duration of the active business contract plus **5 years** following termination for accounting, tax, and legal audit purposes.
- **Candidate / Talent Data:** Retained in our Talent Pool database for up to **3 years** from the last active interaction, after which profiles are either refreshed via consent or permanently deleted/anonymized.
- **Marketing & Sales Leads:** Retained until you opt out or request erasure.
- **Log Data & Cookies:** Retained in accordance with standard browser persistence rules for up to **12 months**.

8. YOUR DATA PROTECTION RIGHTS

Under applicable privacy legislation (including GDPR and CCPA where applicable), you possess the following rights regarding your personal data:

- **Right of Access:** The right to request a copy of the personal data we hold about you.
- **Right to Rectification:** The right to request correction of inaccurate or incomplete personal data.
- **Right to Erasure ("Right to be Forgotten"):** The right to request the permanent deletion of your personal data, subject to legal retention obligations.
- **Right to Restrict Processing:** The right to request that we limit the processing of your data under certain conditions.
- **Right to Data Portability:** The right to receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** The right to object to processing based on our legitimate interests or direct marketing outreach.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw your consent at any time without affecting the lawfulness of processing prior to withdrawal.

To exercise any of these rights, please submit a written request to mary.b@tutstaff.com. We will respond to your request within **30 days**. You also have the right to lodge a complaint with your local Data Protection Authority.

9. DATA SECURITY

We employ robust technical, administrative, and organizational security measures to protect your personal data against unauthorized access, destruction, loss, alteration, or disclosure.

These measures include:

- SSL/TLS encryption for all data in transit across our Site.
- Access control mechanisms limiting employee access to personal data on a strict need-to-know basis.
- Regular security audits and use of secure cloud infrastructure.

However, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your data, we cannot guarantee absolute security.

10. COOKIES AND TRACKING POLICY

Our Site uses cookies and similar tracking technologies to enhance user experience, analyze site usage, and support our marketing efforts.

Types of Cookies Used:

1. **Essential Cookies:** Necessary for the technical operation of the Site (e.g., page navigation, security). These cannot be disabled.

2. **Analytical / Performance Cookies:** Help us understand how visitors interact with our Site by collecting anonymous statistical information (e.g., Google Analytics).
3. **Functionality Cookies:** Remember choices you make (such as language or region preferences) to provide a personalized experience.

Managing Cookies:

You can manage or disable cookies through your web browser settings. Please note that disabling certain cookies may affect the functionality of our Site.

11. CHILDREN'S PRIVACY

Our Site and Services are intended exclusively for commercial B2B use by professionals and adults. We do not knowingly collect or solicit personal data from individuals under the age of 18. If we become aware that we have collected personal data from a child under 18 without parental consent, we will take immediate steps to delete that information.

12. CALIFORNIA PRIVACY RIGHTS (CCPA Notice)

If you are a resident of California, USA, the California Consumer Privacy Act (CCPA) provides you with specific rights regarding your personal information:

- The right to know what personal information we collect, use, and disclose.
- The right to request deletion of your personal information.
- The right to opt out of the "sale" or "sharing" of personal information (Note: **TUT STAFF does not sell personal information**).
- The right not to receive discriminatory treatment for exercising your CCPA rights.

To make a CCPA request, please contact us at mary.b@tutstaff.com.

13. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in legal requirements, operational practices, or technological advancements.

Any updates will be posted directly on this page with a revised "Last Updated" date at the top. We encourage you to review this Policy periodically to stay informed about how we protect your information. Your continued use of the Site or Services following the posting of changes constitutes your acceptance of such changes.

14. CONTACT US

If you have any questions, comments, or formal requests regarding this Privacy Policy or our privacy practices, please reach out to us at:

Email: mary.b@tutstaff.com

Website: <https://tutstaff.com>

Jurisdiction: Republic of Kazakhstan