

PRIVACY POLICY

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PRIVACY POLICY

Please read this policy carefully before using our services.

Brokwise Private Limited, a company incorporated under the Companies Act, 2013, having its registered office at Plot no. 27 A, Bahubali Nagar, Mansarovar, Jaipur - 302020 ("Brokwise", "Company", "we", "us", "our"), acts as the Data Fiduciary in respect of the personal data collected and processed through the Platform.

To offer our users access to our platform, we collect various information from you. This Privacy Policy outlines how we collect, retain, share, store, and process your data to provide you trouble-free and seamless access to our platform. Please note that this Policy may undergo periodic revisions, so we recommend visiting this page regularly to stay updated on any changes we make.

**BY ACCESSING OR USING ANY PART OF OUR PLATFORM, YOU
ACKNOWLEDGE AND AGREE TO BE BOUND BY THIS PRIVACY
POLICY. IF YOU DO NOT AGREE TO ANY PART OF THIS PRIVACY
POLICY, YOU MAY NOT ACCESS OUR PLATFORM.**

It is important to read this policy in conjunction with the Terms of Use applicable on you along with our Master Platform Terms of Use as it collectively governs your use of our Platform.

1. KIND OF DATA COLLECTED

By accessing our services, you consent to provide us with data as described below. We collect this data strictly for lawful purposes including performance of contract, compliance with legal obligations, and for legitimate business purposes connected with operating the Platform.

Please note: We collect only such personal data as is necessary and proportionate for the specified lawful purposes described in this Policy.

Please find below the details of how we and our affiliates collect data.

S. No.	Means of Gathering Data	Data Collected
1.	Data you input while registering yourself on our platform.	Account Data: We collect the information you provide when you register yourself as user on Brokwise, including your Full Name, Phone Number, years of Experience, Location, Address and E-mail address. Additionally, we

may request further information later to verify the accuracy of the data provided by you.

How we use this Data: we collect this data to offer you access to our Platform; to ensure a safe and seamless experience on our Platform; to fulfil our contractual obligations; to provide support and communication; to enable future communication with you; for enabling marketing and outreach; to comply with legal requirements; and to improve our services.

Other Data Solicited: you might be required to provide any further information which would be necessary for your verification and to register yourself as user at Brokwise.

How we use this Data: we collect this data to offer you access to our Platform; to ensure a safe and seamless experience on our Platform; to fulfil our contractual obligations; to provide support and communication; to enable future communication with you; for enabling marketing and outreach; to comply with legal requirements; and to improve our services.

Feedback and Other Data: This includes the following:

- If you seek support, we may record, retain, and capture your call, chat, and e-mail.
- The feedback & reviews you provide on our intermediary services.

- The sensitive information you share with us over the support.

How we use this Data: This data is used to provide support and communication; to improve our services; to ensure a safe and seamless experience on our Platform; to comply with legal requirements; and to enable future communication with you;

2. Data we collect about you from third parties
 - a) Basic signup:** When you sign up yourself on our platform through third party authentication, we receive your Full Name and E-mail address from them.
 - b) KYC:** When you successfully do your KYC at our third party integrators, your basic profile details ranging from Full Name, Address, Phone Number, Date of Birth, Gender, your basic source of

verification, and image is received by us. We do not store or retain copies of your KYC documents or identification proofs. KYC documents are processed and retained by the respective regulated third-party service provider in accordance with their legal obligations.

Transaction Information: When you successfully make any transaction redirected from our platform through a payment gateway, we get basic transaction ID along with your name, phone no and amount paid. We do not store or process your card, banking or payment instrument details. Such financial information is processed directly by the respective payment gateway provider.

How we use this Data: We collect this data to offer you access to our Platform; to ensure a safe and seamless experience on our Platform; to fulfil our contractual obligations; to provide support and communication; to enable future communication with you; for enabling marketing and outreach; to comply with legal requirements; and to improve our services.

Third Party Plugins: The Platform may integrate, utilise, or embed third-party tools, plugins, software development kits (SDKs), application programming interfaces (APIs), or service providers which collect certain information with regard to your usage pattern, technical glitches, device information, system performance

metrics, log data, IP address, browser type, operating system, crash reports, diagnostic data, and other analytical information.

How we use this Data: we collect this data to ensure a safe and seamless experience on our Platform; to fulfil our contractual obligations; to provide support and communication; to enable future communication with you; for enabling marketing and outreach; to comply with legal requirements; and to improve our services.

3.	Data we collect from your usage of our Platform.	Profile information: when you successfully register yourself and start exploring and using our platform, we may capture and retain details provided by you, your complete transaction history, implied location data and usage data.
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How we use this service: we collect this data to offer you access to our platform; to ensure a safe and seamless experience on our platform; to fulfil our contractual obligations; to provide support and communication; to enable future communication with you; for enabling marketing and outreach and to comply with legal requirements.

Usage Data: We may collect data about how you interact on our platform. This includes data such as app/page crashes, type of browser used, and your usage pattern on our Platform.

How we use this service: We may collect this data to provide support and communication; to ensure a safe and seamless experience on our platform;

to enable future communication with you and to improve our services.

Device Data: we may collect data about the devices you use to interact on our Platform. This includes the device IP, device information, operating system and its version, preferred language, advertising identifiers, browser plug-in types and versions, and time zone settings.

How do we use this data: We may collect this data to improve our services; to provide support and communication; to ensure a safe and seamless experience on our Platform; for enabling marketing and outreach and to comply with legal requirements.

Your Usage Pattern: we collect and store a certain type of information when you interact on our Platform.

This includes your interaction on our Platform. For this we use your device cookies and other unique identifiers.

"cookies are files with a small amount of data that is commonly used as anonymous unique identifiers. These are sent to your device from our application/platform and are stored in the internal memory of your device."

Purpose of Using Cookies: We may collect this data to ensure a safe and seamless experience on our Platform, for enabling marketing and outreach and to improve our Services.

2. REASONS & MANNER IN WHICH WE USE YOUR COLLECTED INFORMATION?

The data that is collected as per the above-mentioned clause will be used in the manner detailed below:

S. No.	Reason for use	Manner of Use
1.	To offer you access to our Platform	We use the collected data to confirm your eligibility, authenticate your profile, and complete your registration as a user on our Platform. Thereafter, this data enables us to provide you an access and offer you a subscription of our Platform or for the developers to list their projects.
2.	To ensure a safe and seamless experience on our Platform	We utilise your data to ensure you have a safe and seamless experience on our Platform. Our focus is on protecting your information and providing user-friendly features to facilitate smooth interactions, fostering a trustworthy environment and for connecting you with the other verified brokers and developers.
3.	To fulfil our contractual obligations	We utilise the information to fulfil and execute our contractual obligations, ensuring that you have a satisfactory,

		<p>user friendly and hassle-free experience at Brokwise.</p>
4.	To provide support and communication	<p>We utilise the information to provide you with robust customer support, ensuring that you are not burdened with the need for repeated inputs and allowing us to address your concerns or issues effectively and seamlessly.</p>
5.	To enable future communication with you	<p>We may use your personal information to inform you about our new services, products & listings; sharing contact details of brokers/developers (only if your request is accepted by them); and to gather feedback and valuable suggestions for improving our services.</p>
6.	For enabling marketing and outreach	<p>We may utilise your personal information, including your interactions on our Platform, for</p>

		advertising, marketing, display, and promotional purposes.
7.	To comply with legal requirements	We may utilise and share your data to investigate or address any complaints and disputes, in accordance with applicable laws, or as requested by regulators, courts, government entities, or other officials under the laws.
8.	To improve our services	We collect and analyse data from your interactions with our platform to identify areas for improvement. This helps us enhance the user experience, streamline processes, and address any challenges or concerns

3. HOW DO WE SHARE YOUR INFORMATION WITH THIRD PARTIES?

We take utmost care in protecting your personal information and do not engage in the sale of your data to third parties. However, we may share or disclose your relevant data to third-party service providers, agents,

representatives, support teams and law enforcement agencies to ensure the best possible delivery of our services and for legal compliances. The details of how we share the collected data are outlined below:

S. No.	Person Shared With	Purpose for Sharing
1.	Sharing with third party service providers, agents, representatives, support team, and business partners	<p>Service Providers: We work with third-party service providers to execute various functionalities of our Platform. We may share your relevant information with such service providers to help you access our services in the best possible manner. Some of these functionalities may include:</p> <ul style="list-style-type: none">• For ensuring your seamless and enjoyable experience at our platform.• For seamlessly providing all the features on our Platform.• For resolving any issues, technical glitches and for

enabling regular maintenance of our Platform.

- For providing customer support.
- For storing the data on the servers.
- For processing payments.
- For any refunds.
- For follow-ups and feedback.
- For Marketing and Advertisement Purposes.

Please note, we share personal data only with third-party service providers for authorised purposes. While we implement reasonable due diligence and contractual safeguards, the processing of personal data by such third parties is governed by their respective privacy policies and applicable laws.

Third-Party Services: Our Platform may provide links or integrations with third-party platforms and services that are beyond our control.

Please be aware that the use of such third-party services is governed by their own privacy policies and terms, which are not under our control. We advise you to review the privacy policies of these third-party platforms before using their services through our Platform.

2. Sharing with law enforcement agencies If a government authority or law enforcement officers make a lawful request or requirement for information, and we believe that such disclosure is necessary to comply with applicable laws, regulations, or legal processes, we may share the required information without obtaining prior consent from you.

4. INTERNATIONAL DATA TRANSFER

Your personal data may be stored, processed or transferred to servers located outside India depending on our service providers' infrastructure. Where such cross-border transfer occurs, we ensure that such transfer is undertaken for lawful purposes and subject to reasonable safeguards as required under applicable laws. By using the Platform, you expressly consent to such cross-border processing of your data. Where required under applicable international laws such as the GDPR, such cross-border transfers shall be undertaken pursuant to recognised legal transfer mechanisms including adequacy decisions, standard contractual clauses, or other lawful safeguards.

5. WHAT ARE YOUR RIGHTS RELATED TO YOUR DATA?

It is important for us to prioritise your data control. If you wish to exercise any of your rights mentioned under this policy, please contact us at _____ (email address). You shall have the following rights:

S. No.	Rights	Purpose
1.	Right to Rectification	If any personal data provided by you is found to be inaccurate or incomplete, you have the right to provide us with

		<p>accurate, complete, and up-to-date data. We encourage you to always provide us with true and accurate information to ensure uninterrupted access to the Brokwise.</p> <p>Further, when you update any information with us, we may retain a copy of your previous information for record-keeping purposes.</p>
2.	Right to Withdraw Consent	You have the right to withdraw your consent to this policy by terminating all legal agreements with us and explicitly indicating your unwillingness to access and remain registered on our Platform. Upon withdrawal of consent, we shall cease processing your personal data and delete your personal information within 7 working days, unless such processing is required under applicable law or for legitimate legal

purposes. Withdrawal of consent may result in suspension or discontinuation of your access to the Platform. However, please be aware that certain data may be retained by us even after you withdraw your consent, as some provisions will continue to apply beyond the termination of the agreement according to the terms of use of our Platform.

Please note: If your data and information are no longer necessary for our purposes, we will ourselves remove them from our system.

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| 3. | Right to opt-out | Marketing opt-out: We may periodically send newsletters, advertisement, feedback forms, and notifications regarding our services. If you wish to stop receiving such emails and notifications you can opt-out by |
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using the unsubscribe options provided in the offerings or by sending an email to us from your registered email and by disabling your app notifications.

Please note that even if you choose to opt-out of promotional offerings, you may still receive non-promotional communications from us, such as important updates and alerts with regard to new features, listings, enquiries & Proposals.

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| 4. | Right to Erasure / Deletion | You have the right to request deletion of your personal data where: (a) it is no longer necessary for the purposes for which it was collected; (b) you withdraw consent (where processing was based on consent); (c) you object to processing based on legitimate interests; or (d) the data has been unlawfully processed. This right is |
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		subject to our legal obligations to retain certain data for compliance purposes.
5.	Right to Access	You have the right to access the personal information we store about you. To exercise this right, you may send us an email from your e-mail address. We will respond to your request within the reasonable timeframes and provide you with information about the personal data we hold.
6.	Right to nominate	You may nominate any individual to exercise your rights under this Privacy Policy and applicable law in the event of your death or incapacity. Such nomination may be made by writing to us from your registered email address along with necessary identification details. We reserve the right to verify

		the authenticity of such nomination before acting upon it.
7.	Right to Grievance Redressal	You have the right to lodge a complaint with our Grievance Officer and, if unresolved, to escalate to the Data Protection Board of India.

6. HOW SECURE IS YOUR INFORMATION?

We have implemented stringent security measures to safeguard the confidentiality and integrity of the information you provide to us. Our Platform utilises state-of-the-art Secure Socket Layer (SSL) software to encrypt your data during transmission. Additionally, we employ industry-standard data collection, storage, and processing practices, along with robust security measures, firewalls to prevent unauthorised access, alteration, disclosure, or destruction of your personal information, username, password, transaction details, and other stored data.

However, it is essential for you to take precautions to protect yourself against unauthorised access to your devices you use to access our platform. This includes using strong, unique passwords, keeping your login credentials confidential, logging out after each session on shared devices, and maintaining updated antivirus software.

Please note: While we implement industry-leading security measures, no system is completely secure. We cannot guarantee absolute security of data transmitted over the internet or stored electronically.

7. DATA BREACH NOTIFICATION

In the event of a personal data breach that is likely to result in significant harm to data principals, we shall notify the relevant regulatory authorities and affected individuals in accordance with the DPDP Act and, where applicable, other international data protection laws including the GDPR.

8. DATA RETENTION

We retain personal data only for as long as it is necessary to fulfil the purposes for which it was collected, including for satisfying contractual obligations, complying with legal, regulatory, tax or accounting requirements, resolving disputes, and enforcing our agreements.

Account-related information shall generally be retained for the duration of your active account and for a reasonable period thereafter as required under applicable law. Transaction-related information shall be retained in accordance with applicable financial and taxation laws. Verification status information received from third-party KYC providers shall be retained only for compliance and audit purposes as required. Thereafter, such data shall be deleted or anonymised.

9. CHILDREN'S PRIVACY

Our Platform is not intended for individuals below the age of 18 years. We do not knowingly collect personal information from minors. If we become aware that an account is operated by a minor, we reserve the right to suspend or terminate such account and delete the associated personal information.

10. CONSENT MECHANISM

Consent for collection and processing of personal data is obtained at the time of account registration through an explicit acceptance mechanism (such as checkbox acceptance). You may withdraw your consent at any time by contacting us. In case of material changes affecting the purpose of processing or your rights, we shall obtain fresh consent where required under applicable law.

11. GRIEVANCE REDRESSAL

In accordance with the DPDP Act, we have appointed a Grievance Officer to address any concerns relating to processing of personal data. Contact details:

Name of Grievance Officer: Mr. Anshul Sharma

E-mail: Grievance@Brokwise.com

Registered address: Plot no. 27 A, Bahubali Nagar, Mansarovar, Jaipur - 302020

- You may submit a complaint or grievance via email, or by sending a written letter at our registered address.
- We will acknowledge receipt of your grievance within two (2) working days.
- Our Grievance Officer will investigate and respond to your grievance within thirty (30) days from the date of receipt.
- If your grievance is not satisfactorily resolved, you may escalate the matter to the Data Protection Board of India (under DPDPA) or the relevant supervisory authority in your jurisdiction.

12. UPDATES TO THIS POLICY

We reserve the right to revise this Policy at any time. Where required under applicable law, we shall obtain fresh consent for material changes affecting your rights.

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