

FAMPAY-TT PRIVACY POLICY

Please Read this Policy Carefully Before Using the Platform:

In order to provide our users (“**you**”, “**your**”) with the best quality Services, we need to access and retain certain information about you. The collection, handling, retention, and deletion of such information we gather from you is governed by this Privacy Policy (“**Policy**”) as detailed below. This Policy refers to, incorporates, and includes our Terms of Service available at fampay.in/terms. We may revise this Policy as well as update our Services and the Platform from time to time, so please keep visiting this page regularly to take notice of any changes we make. If you do not agree with any part of this Policy, please stop using our Services immediately.

This Policy is an electronic record under the Information Technology Act, 2000 and the rules made thereunder. This Policy is generated by a computer system and does not require any physical, electronic, or digital signature.

The capitalized words used in this Policy and not defined shall have the meaning given to such words in the Terms of Service.

1. NAME AND CONTACT INFORMATION:

- 1.1. The FamPay mobile platform/website (“**Platform**”) is made available by Fampay Solutions Private Limited having its registered office at No. 7, 1st A Main, Sector 6, H.S.R Layout, Bengaluru (Bangalore) Urban, Karnataka, 560102. FamPay has entered into a co-branding agreement with Tri O Tech Solutions Private Limited, a licensed pre-paid payments issuer incorporated under the laws of India, having its registered office at 5th floor, Punj Essen House, 17-18, Nehru Place, New Delhi, Delhi 110019 (“**Triotech**”), to issue pre-paid payment instruments (“**Wallet(s)**”) to you (which you can use through the Platform). This Policy is a binding agreement between you, Triotech and FamPay. Throughout this document, we use the terms “**we**”, “**us**” and “**our**” to refer to Triotech and FamPay and the terms “**you**” and “**your**” to refer to you, the user of the Platform.

2. WHAT DATA DO WE COLLECT:

- 2.1. We collect the information and data you provide only to ensure that we can provide you our Services in the best manner possible. We wish to keep such collection and usage of data as transparent as possible. We have detailed the types of data we collect for your perusal below.
- 2.1.1. In order to create and maintain the FamPay Account the following types of data is collected by FamPay and the same constitutes “**FamPay Account Data**”. FamPay will have the right to use the FamPay Account Data in accordance with the terms of this Policy; it may share parts of this data with Triotech from time to time. Triotech too will use such data in accordance with the terms of this Policy

Serial Number	Means of Gathering Data	Data Collected
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	<p>Data you input in the course of signing up and using FamPay's services.</p>	<p>User profile data: This includes your name, phone number, login name, profile picture (if any), and birthdate, email address.</p> <p>Demographic data: Includes your name, age, gender, income, occupation and address (including city).</p> <p>Address Book Contacts: If you grant FamPay access to the address book on your mobile device, then FamPay may access and store the names and contact information from your address book to facilitate invitations, social interactions and payments/transfers to your contacts through our Platform and for other purposes described in this Policy.</p> <p>Feedback data and other data: We collect the data that you actively put into the Platform. This includes the follows:</p> <ol style="list-style-type: none"> User feedback. If you call our call centres, we may record calls for quality and training purposes. Data you input when you participate in our referral programs. For example, when a user refers another person, we receive the referred person's personal data from that user. Account users who request services for, or on behalf of other users, or who enable such users to request or receive services through their accounts.
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	<p>Data we collect from your usage of our Services</p>	<p>e. Geolocation data: We collect the location data from your mobile device if enabled by you to do so. We may also collect this data when our Platform is running in the background of your mobile device. You will not be able to use critical and essential features of the Platform if you disable the location services.</p> <p>f. Usage data: FamPay collects data about how you interact with our Services. This includes data such as access dates and times, Platform features or pages viewed, Platform crashes and other system activity, type of browser, and third-party sites or services used before interacting with our Services.</p> <p>g. Device data: We may collect data about the devices used to access our Services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.</p> <p>h. Cookies: We also collect information through the use of “cookies”, tracking pixels, and similar technologies to understand how you navigate through the Platform to learn your preferences. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help</p>
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		websites and apps recognize your browser. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use the Platform.
	Information we receive from other sources	We may also be working closely with third parties (including, for example, business partners, technical sub-contractors, analytics providers, search information providers) and may receive information about you from such sources. Such data may be shared internally and combined with data collected on this Platform.

- 2.2. We may collect from you, data associated with your usage of your Wallet, such as your Wallet transaction history, data in relation to you applying for and/or availing any services in relation to the Wallet, loads, transfers and spends made using the Wallet, KYC data (including your PAN, Aadhaar data etc.), balances, payment details, for effecting transfer of funds through various payment channels provided by us. Collectively this data will be referred to as “**Wallet Data**”. We will have the right to use the Wallet Data in accordance with the terms of this Policy.

- 2.3. In addition to the above, we may also ask you to provide certain additional information about yourself on a case-to-case basis including your live photo which may be utilized by us for the purpose of completing your KYC.

3. **HOW AND WHY DO WE USE YOUR DATA?**

- 3.1. Your data will be used for the fulfilment of the Services and developing and enabling new features. We have detailed the manner in which we use the collected data below:

Serial Number	Reason of Use	Manner of Use
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	Enabling our Services and updating our Platform features	<p>We use the data collected to personalize, maintain, and improve our Services. This includes using the data to:</p> <ol style="list-style-type: none"> Create and update FamPay Accounts and Wallet Accounts. Enable Wallet and other Services. Enable features to personalize your FamPay Account and Wallet Account. Enable social features. Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends
	For enabling customer support	We use the information to provide customer support, including to resolve your concerns arising from the use of the Services, and train our customer service executives.
	For research and development	We may use the data collected for research, analysis, and product development to improve the UI/UX experience, all of which will ultimately improve how you experience the Platform. This also helps us develop automated actions to be triggered in certain events, such as when we need to implement dynamic pricing, detecting fraud, account termination, amongst other things.
	Enabling communication between users	We will allow you to share your Wallet transactions with your friends (other FamPay users in your phone contact list) through the Platform.
	For marketing and outreach	We may use the data we collect to market the Platform and our Services. This includes sharing your feedback, ratings, screen names and photograph (if any) for purely promotional and marketing purposes. Such promotion and marketing

		may be done via hoardings, banners, pamphlets, online advertising etc.
	Automated decisions	We may use the data so collected to develop automated decision-making capabilities.
	Legal compliance and requirements	We may use the data we collect to investigate or address claims or disputes relating to the use of our Services, or as otherwise allowed by Applicable Law, or as requested by regulators, government entities, and official inquiries

4. **HOW DO WE SHARE THE COLLECTED INFORMATION?**

- 4.1. The information we collect is shared only on a need basis, i.e. we do not sell your data to any third parties for profit. However, we may enter into data-sharing agreements or disclose the collected data to third parties in order to provide the Services to you. We have detailed the manner in which we share the collected data below:

Serial Number	Person Shared With	Purpose for Sharing
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	<p>Sharing with third parties.</p>	<p>API and integration partners: If your connection to the Platform is enabled through an integration with a third-party service, we may share information about your use of the Platform with that third-party. We may share your information with our third-party partners in order to receive additional information about you. We may also share your information with third-party partners to create offers that may be of interest to you.</p> <p>Service Providers: We work with third-party service providers to perform services on our behalf, and we may share your information with such service providers to help us provide our Services through the Platform.</p> <p>Third-party services: The Platform may allow you to connect with other websites, products, or services that we do not have any control over. However, usage of such third-party services is subject to their privacy policies and not within our control. We recommend that you have a look at their privacy policies before agreeing to use their services.</p> <p>Subsidiaries and holding companies: We share your data with our subsidiaries and affiliates to help us provide our Services or conduct data processing on our behalf.</p> <p>Change in control: While negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets, we may have to disclose our databases and information we have stored in the course of our operations.</p> <p>Where appropriate to the context, the third parties that we share or make available your personal data are bound</p>
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		by contractual obligations to keep such personal data confidential and use it only for the purposes for which we disclose it to them and also maintain at minimum the same level of data protection that is adhered to by us.
	Sharing with law enforcement when needed	If any governmental authority or law enforcement officers request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process.

5. **HOW IS PAYMENT DATA HANDLED?**

- 5.1. We may provide the functionality to load your Wallet through debit card, credit card or any other payment mode and collect data in relation to such loading of your Wallet through these payment modes (“**Payment Data**”) in accordance with applicable law. The information regarding your Payment Data may be stored once you make the first payment by the card/other payment mode and is protected against unauthorized access. For this purpose, a certified payment provider is used whose systems meet the applicable security standards, such as for example PCI-DSS (Payment Card Industry – Data Security Standard). The Payment Data is stored by the contracted PCI-DSS-certified payment provider for recurring transactions. We do not, ourselves, store your Payment Data and if we ever do, it will be only in abbreviated form for analysis purposes or to prevent fraud and will be stored in accordance with the Applicable Laws
- 5.2. In order to ensure that the debit/credit card/other payment mode is used by the legitimate owner and to prevent cases of fraud, the Payment Data and card information is transferred to one or more external payment security services. This transfer may also include additional personal data. The external payment security services may process personal data on our behalf.

6. **WHAT ARE YOUR RIGHTS TO CONTROL THE DATA?**

- 6.1. It is important for us that you remain in control of your data. You alone are the owner and manipulator of your data, and you shall have the right to restrict our usage of the data in the manner provided below. You should also remain informed of your rights with regards to the use of your data and information by us. Your rights with regards to your data are listed below.

Serial Number	Your Right	Scope of Right
	Right to confirmation	You have the right to obtain a confirmation from us as to whether your personal data (your name, housing address, age, credit card information, amongst other data) is being processed.

	Right to rectification	<p>In the event that any personal data provided by you is inaccurate, you shall have the right to provide us with the accurate data and have us rectify such data at our end immediately.</p> <p>We urge you to ensure that you provide us with accurate and correct information/data at all times in order to ensure your use of our Services is flawless</p>
	Right to erasure	<p>You have the right to demand us to erase your personal data without undue delay and we will do so without undue delay, provided that the data is no longer required by us.</p> <p>However, rest assured that we will delete your personal data from our databases as soon as the legal basis for processing such personal data lapses. Do note that multiple legal basis for processing your personal data may exist in parallel and we may still have to retain some of your personal data at any time</p> <p>We may, however, reserve the right to retain and store your personal information for our business purposes, whether such personal information has been deleted or not. After a period of time, your data may be anonymised and aggregated and then may be held by us as long as necessary, to enable purchases of products and provision of services or for analytics purposes</p>
	Right to the restriction of data processing	<p>You have the right to require us to restrict the usage of data when the use of such data may be illegal or when such data is inaccurate.</p>

	Right to withdraw consent	<p>You have the option, at any time while availing our Services or otherwise, to withdraw your consent given to us for processing your data. In case of withdrawal of your consent, we reserve the option not to provide the Services for which such information was sought. For withdrawing your consent, you may send an email to us at contact@fampay.in. Your withdrawal will become effective upon the receipt of an acknowledgment by you from us</p>
	Right to opt-out	<p>Marketing opt-outs: You may opt out of receiving promotional emails from us by writing to us at contact@fampay.in. You may also opt out of receiving emails and other messages from us by following the unsubscribe instructions in those messages. However, even if you have opted out of receiving information from us, we will still send non-promotional communications.</p> <p>Push notifications: You can opt out of receiving push notifications through your device settings. Please note that opting out of receiving push notifications may impact your use of the Platform.</p> <p>Location Information: While you can prevent your device from sharing location information at any time through its operating system settings, sharing such location is core to how the Platform works and without it we cannot provide our Services accurately to you.</p>

7. **WHAT ARE OUR DATA SECURITY PRACTICES?**

- 7.1. We process your Personal Information with consent. By using our Platform or services and/or by providing your Personal Information, you consent to the processing of your Personal Information by FamPay in accordance with this Privacy Policy. If you disclose to us any Personal Information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy
- 7.2. We use appropriate technical and organizational security measures to ensure a level of protection to your personal data which is commensurate to the risk, taking into account state

of the art technologies, implementation costs and the nature, scope, context and purposes of processing as well as the risk of likelihood and the degree of risk. The transfer of personal data between your end device and us is generally carried out in an encrypted form (TLS encryption). You can identify an encrypted connection by the lock symbol in the address line of your browser. If you communicate with us by email, access by third parties cannot be ruled out. In the case of confidential information, we recommend using encrypted email communication (PGP).

- 7.2. This Policy and the security measures and practices implemented by us to protect your information shall be the reasonable security practices and procedures under section 43A of the Information Technology Act, 2000.

8. **CHILDREN’S PRIVACY:**

- 8.1. We take the privacy of Minors very seriously. Please make sure that you as the Parent who accepts these terms on behalf of the Minor, supervise the types of data that the Minor shares with us. To make sure data shared by Minors is safe, we may (from time to time) integrate new mechanisms and safeguards on our Platform.

9. **COMMUNICATIONS FROM US:**

- 9.1. We may from time to time send you service-related announcements when we consider it necessary to do so (such as when we temporarily suspend the Platform for maintenance, or security, privacy, or administrative-related communications). We send these to you via SMS or email, as we deem fit.

10. **LINKS TO OTHER THIRD – PARTY SITES AND COLLECTION OF INFORMATION:**

- 10.1 Our Platform may provide links to other third - party Platforms (“**Third – Party Sites**”) that may collect your personal information including your IP address, browser specification, or operating system. We are not in any manner responsible for the security of such information or their privacy practices or content of those Third – Party Sites. Additionally, you may also encounter “cookies” or other similar devices on certain pages of the Third – Party Sites and it is hereby clarified that we do not control the use of cookies by these Third – Party Sites. These third-party service providers and Third-Party Sites may have their own privacy policies governing the storage and retention of your information that you may be subject to. This Policy does not govern any information provided to, stored on, or used by these third-party providers and Third-Party Sites. We recommend that when you enter a Third-Party Site, you review the Third-Party Site’s privacy policy as it relates to safeguarding of your information. You agree and acknowledge that we are not liable for the information published in search results or by any Third-Party Sites.

11. **PUBLIC POSTS:**

- 11.1 You may provide your feedback, reviews, testimonials, etc. on the Platform on your use of the Services provided by us (“**Posts**”). Any content or information and Posts that you share or upload on the publicly viewable portion of the Platform (on discussion boards, in messages and chat areas, etc.) will be publicly available, and can be viewed by other users. Your Posts shall have to comply with the conditions as mentioned in the Terms. FamPay retains an unconditional right to remove and delete any Post or such part of the Post that, in its opinion, does not comply with the conditions in the Terms. FamPay reserves the right to use, reproduce and share your Posts for any purpose. If you delete your Posts from the Platform, copies of such Posts may remain viewable in archived pages, or such Posts may have been copied or stored by other users.

12. **UPDATES TO THIS POLICY:**

- 12.1 We may occasionally update this Policy. Use of our Services after an update constitutes consent to the updated Policy to the extent permitted by law. If we make significant changes, we will notify you of such changes in advance. Please take the time to periodically review this Policy for the latest information on our privacy practices.

14. **GRIEVANCE OFFICER:**

- 14.1 We have appointed a grievance officer to address your concerns regarding data safety, privacy with regard to your FamPay Account. You may contact the Grievance Officer at:

Name: Saransh Agarwal

Office hours: 12 noon to 7 PM.

Email address: safety@fampay.in

- 15.2 If your grievance is not resolved to your satisfaction, you may escalate the grievance to -

Name: Anchit Shukla

Office hours: 12 noon to 7 PM.

Email address: grievanceofficer@fampay.in