# **Privacy policy**

iPaisa respects your privacy and desires to promote trust and confidence on the Internet. As such iPaisa feels it is necessary to disclose to you what information iPaisa collects and tracks and what we do with the information that we collect.

iPaisa is a mobile application developed by Edsom Fintech Private Limited.

We value the trust you placed in us Your privacy is of the utmost importance to us and the protection of your personal data is a key commitment for us. Hence we maintain the highest standards for secure transactions and user information privacy.

We are governed by the provisions of applicable law in India including the information technology Act 2000 and the Information Technology Rules 2011 to maintain the privacy of your personal data.

Please read the following statement to learn about our information-gathering and dissemination practices.

#### Note:

By downloading /using /accessing the iPaisa platform, as defined for business and or personal use, you indicate, understand, agree, and consent to this privacy policy.

You hereby provide your unconditional consent or agreements to Edsom Fintech Pvt. Ltd., as provided under the Information Technology Act 2000 and the rules and regulations made therein for accessing the iPaisa platform.

This privacy policy is a legally binding contract between you and the iPaisa.

This privacy policy does not require any physical, electronic, or digital signature.

The terms and conditions of this privacy policy as defined below will be effective upon your registration on the iPaisa platform and will govern the relationship between you and iPaisa for your use of the iPaisa platform.

This privacy policy shall be read together with respect to terms of use or other terms and conditions of the respective iPaisa product offering on the iPaisa platform.

## **Data and information**

• We collect, process, transfer, store, and/or record your data and information while you visit any of the iPaisa platforms or avail of its services.

Information may be collected in various ways and formats during the course of your visit to

- 1. Registering on iPaisa platforms as a user Or
- 2. Registering on paisa platform as a merchant Or
- 3. Any other relationship that may be governed by terms and conditions listed on iPaisa platform
- 4. Access iPaisa platform by the ways of visiting iPaisa platform, accessing, links, emails, notification sent by iPaisa platforms
- We and our service providers or business partners may also collect information made publicly available through other third party platforms through online or offline databases that are otherwise legitimately obtained and are subject to the third party's terms of use and privacy statement.

 We automatically track certain information about you, based upon your behaviour on our app, we use this information to do internal research, interests and behaviour to better understand, protect and serve you better. This information is compiled and analyse on an aggregated basis.

#### Information / Data we collect -

- Personal details for example name, contact details -including residential address, Date
  of birth, documents such as Identity card, Passport details, Aadhaar details, PAN,
  Voter ID, driving licence and /or education details provided by you to us to avail
  various products or services from us.
- Your details including transaction History, Balances, payment details for effecting transfer of monies to various payment channels provided by us.
- Information obtained from your mobile device by way of using our app like device location, communication information including Contacts, Storage, Model, mobile network, transactional and promotional SMS or app notifications.
- Financial details for example, Income ,Expenses and our credit history needed as part of request for some of our products or services.
- Images of documents, photos required to avail any of our services or products.
- Voice recordings of your conversations with our customer care agent with you to address your queries / grievances.
- Employment details like occupation, positions held ,employment history, salary and/ or benefits as a part of your record retention for credit for various product evaluations are required under applicable law including prevention of money laundering rules 2005.
- Your messages on message boards, chats or any other message or feedback areas shared on iPaisa platforms and social media.
- The devices and identification numbers of devices used by you to access iPaisa a platform.
- Your location stored on your browser or devices and behaviour on iPaisa platform.
- The operating system of your device browser, browsing behaviour, or any other data as permitted to be stored by mobile app stores.

# Usage and purpose of data collection

iPaisa always desires to provide an efficient, safe, smooth and customised experience. Also to provide services features that are most likely meet your needs and to customize our application to make your user experience safer and easier, we may collect, store, use and transfer your information including personal information and non -personal information for the following purpose :

We use your personal data in our business activities for providing are/ or our business partners' products / services and to perform among other actions the following

- 1. To verify your identity, access privilege assigned in order to provide the services you request, or we intend to offer.
- 2. To facilitate the transactions or report on these transactions.
- 3. To detect and protect us against error, fraud and other criminal activity, enforce our terms and conditions and otherwise describe to you at the time of collection.

- 4. To resolve disputes, troubleshoot problems, help promote safe service, collect money, major customer interest in our products and services.
- 5. To inform you about offline or online offers, products, services, updates, customize your experience and improving your experience by using the application by presenting advertisement products and offer.
- 6. To undertake research and analytics for offering or improving our products or services and their security and service quality.
- 7. To respond to your queries or feedback submitted by you.
- 8. To verify your identity for us to provide products or services to you.
- 9. To monitor and review products or services from time to time.
- 10. Providing information to law enforcement agencies or government agencies in connection with a query or investigation on matters as permitted by law.
- 11. To help diagnose problems with our server and to administer our app. Your IP address is also used to help identify you and to gather broad demographic information.
- 12. To identify security breaches and attacks, investigating, preventing and taking actions on illegal or suspected fraud or money laundering activities and conducting forensic audits as part of internal or external audit or investigation by any of the iPaisa entities or government agencies.
- 13. For designing and marketing or products or services and its affiliates products and services.

#### Disclosures

iPaisa uses reasonable precautions to keep the personal information secure and will not disclose this information to other individuals' organization unless required by Law.

However, iPaisa will extend information with the other companies and organization for the sole purpose of fraud protection.

In case of abuse or breach of security we are not responsible for any breach of security or for any actions of any third parties which receive the information illegally. iPaisa will not distribute customer information to be used in mailing list, surveys or any other purpose other than what is required to be performed or services.

iPaisa recommends you to review your personal information and sensitive personal information. You may review your personal information and sensitive personal information shared by you by logging into iPaisa platform using your secure login credentials and may notify us in case any change.

Links to other platforms: Our app may link to other platforms, may collect personally identifiable information about you. iPaisa entities are not responsible for the privacy practices or the content of those linked platforms links to third party advertisements websites or any other electronic communication service may be provided on iPaisa platforms which are not operated by third party practices and are not controlled by, affiliated to, associated with the iPaisa entities. iPaisa does not control the data shared by you on such a Links and shall be governed by respected third parties' privacy policy.

You are required to review those third parties' privacy policy for handling of your data before sharing your data on such links websites or apps.

This disclosure may be required for us to provide you access to our services, to comply with our legal obligations, to enforce the user agreement, to facilitate our marketing and

advertising activities or to prevent, detect, mitigate and investigate fraudulent or illegal activities related to our services.

We do not disclose your personal information to third parties for their marketing and advertisement purposes.

# User discretion and opt out

You agree and acknowledge that your personal information and non- personal information is a matter of your free will. You further agree to all the provisions of this privacy policy and authorise us to manage the data shared by you or collected by us to be used according to this privacy policy.

By using our platform and or by providing your information, your consent to the collection and use of the information you disclose on the app in accordance with this privacy policy including but not limited to your consent for sharing your information as per this privacy policy.

You also grant permission to obtain information from your mobile device by way of using our app including Contacts on your device in order to provide a better payment experience.

However, we provide all our users with the opportunity to opt out of receiving non-essential communications from us on behalf of our partners and from us in general after setting up an account. If you want to remove your contact information from all our lists and newsletters, please click on the unsubscribe button on the emailers.

# **Security and Safeguarding Practices**

We take all the reasonable steps and measures to protect the security of your data from misuse, loss, unauthorised access, modification or disclosure.

iPaisa is a certified entity and has deployed technical and physical security measures to safeguard users personal information and sensitive personal information.

We use latest secure server layers encryption and access control on our systems.

We have provided multiple levels of security to safeguard your app by login / logout option and app lock feature that can be enabled by you. We also ensure the device binding so that the same login cannot be used on different device without any additional authentication or OTP. Please do not share your login password and OTP details with anybody.

### **Cookie Policy**

To enhance your user experience and the efficiency and effectiveness of the platform and certain services and functionalities offered thereon, we may use cookies and tracking technology depending on the features offered.

However, no personal data will be collected via Cookies and other tracking technology, But if you previously provided personal data, cookies may be tied to such information.

Cookie is a small piece of information stored by a web server on a web browser that can be later read back from that browser.

#### Scope and applicability

This privacy policy is applicable to all users of iPaisa including customers, merchants business partners whether registered or non-registered accessing, selling or purchasing, offering products or services on the website application, notifications, links, short messaging services or any other communication medium used or owned by iPaisa.

#### Links to other websites

This privacy policy only applies to iPaisa website and mobile application. Our website and mobile application may contain links to other websites which are not maintained by us, so you are requested to read the other applications and websites' privacy policies when visiting these websites and applications.

#### **Review and Amendment of privacy policy**

This privacy policy will be reviewed and updated by us and the same shall be updated and made available on website and mobile application, time to time. Though every effort would be made to keep you informed of the changes, if any, to the policy, you are kindly advised to review the policy periodically. Any changes to the policy will become effective upon posting of the revised one, on the Internet accessible through iPaisa platforms.

#### Indemnity

You shall indemnify and hold harmless the iPaisa entities, directors, agents, contractors officers, and any third parties relying on the information provided by you for any losses including but not limited to claims, damages, liabilities, assessments, interests deficiencies, settlements, penalties, fines, cost or expenses, awards, suffered, incurred, suspended by or imposed on the iPaisa entities as a result of arising out of, with respect to, in connection with or by use of iPaisa or non-performance of any of the condition, terms, representations or warranties contained in this privacy policy by you.

You further agree that the collection, use, storage, disclosure and or transfer of your information shall not cause any loss to any other person. The information so provided by you may be shared to iPaisa entities and the third party service provided on a need to know basis.

#### Jurisdiction

This privacy policy is governed by and shall be construed in accordance with the Indian Laws and any dispute arising out of or in connection with this agreement, privacy policy shall be subject to jurisdiction of the court of Pune, India only.

## **Grievances**

You may contact us on any aspect of this policy or for any discrepancies / grievances with respect to your data by writing to our grievance officer at care@ipaisa.co.in