

Privacy Policy

This privacy policy document ("Privacy Policy") is published in accordance with the provisions of Rule 4 (1) of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 which requires the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information.

General

1.School of Hawking LLP (LLPIN: AAX-9590) ("the Company") is a registered Limited Liability Partnership that operates **Wise Banker** ("the Platform"), a digital solution designed to empower individuals in managing their personal finances and discovering suitable financial products.

The **primary functionality** of the Platform is to help users **manage their money effectively** through a set of intelligent financial tools. These tools enable users to:

- **Categorize expenses** for better visibility and control over spending,
- Set **daily spending limits** to encourage discipline, and
- Define and track **goal-based savings plans** aligned with their financial objectives.

As a **secondary feature**, the Platform allows users to **explore detailed information about a wide range of financial products** such as personal loans, credit cards, and savings accounts. These offerings are presented in collaboration with various **licensed NBFCs and banks**. Through the app, users can **connect directly with the respective sales teams** of these institutions for further assistance and application processes. **Wise Banker is not a lender or financial institution. It only provides product comparisons and facilitates connections to licensed financial service providers.**

Wise Banker does not directly provide or distribute any financial products or services. It acts as a **discovery and facilitation platform**, bridging the gap between users and financial service providers.

From time to time, the Platform may also introduce additional features to enhance user experience and financial awareness.

2. This Privacy Policy provides specific information on who is processing Your data, how and why it is being processed and Your rights with regard to the control over Your data when availing of the Offerings on the Platform.

3. Please read the terms of this Privacy Policy carefully before accepting. By accepting the terms of this Privacy Policy, **you confirm that you have read, understood, acknowledged, and agreed** to the terms outlined herein in order to access and use the **Wise Banker** platform ("the Platform"), developed and operated by **School of Hawking LLP** ("the Company").

By directly or indirectly using the Platform — including, but not limited to, accessing financial tools or connecting with external financial product providers — you **explicitly consent** to the **collection, sharing, processing, use, storage, and disclosure** of your **Personal Information** and **Non-Personal Information** by us and our affiliated partners, which include **licensed banks and non-banking financial companies (NBFCs)** ("Partner Banks and NBFCs"), for the purpose of facilitating communication and providing details about relevant financial products, in accordance with this Privacy Policy.

Please note that **Wise Banker does not directly offer or distribute any financial products or services**. The Platform serves as a **discovery and connection interface**, helping users explore financial product information and connect with authorized representatives of financial institutions.

We reserve the right to modify or update this Privacy Policy at any time. We recommend that you review it periodically to remain informed about any changes. If you do not agree with the terms of this Privacy Policy, the Platform's Terms and Conditions ("Terms"), or the associated Disclaimer Document, **you must not access or use the Platform**.

4. If you use the Platform on behalf of another individual (such as your child) or an entity (such as your employer), you confirm that you are authorized by such individual or entity to:

- (I) Accept this Privacy Policy on their behalf, and**
- (II) Consent on their behalf to the collection, processing, use, storage, and limited disclosure of their information, solely for the purpose of enabling access to the Platform's features and facilitating communication with Partner Banks and NBFCs, as described in this Privacy Policy.**

Please note that while the Platform may enable access to information and communication with third-party financial institutions, no financial product is offered, sold, or processed directly by the Platform.

Types of Data that we may collect from You

- a. We, the Affiliates and our associate/ affiliate entities/ may collect/ receive/ share/ process/ use/ store Your information to the extent required to provide the Offerings on the Platform, enhance the user experience, build affluence scores/ user insights, analyse data for the introduction of new services and features, and as may be required to comply with any regulatory requirements and contractual obligations. We may collect/ receive/ share/ process/ use/ store the following information about You as well as the device from which You avail the Offerings on the Platform.
- b. **“Personal Information”** will inter alia include any information which is directly or indirectly available to Us to identify or verify individual identity. This may also include sensitive personal data which inter alia includes financial information such as bank account, debit card details, and biometric information.
- c. Wise Banker does not collect or store sensitive personal data such as bank account numbers, debit/credit card details, or biometric information. If any such information is required for availing third-party financial services, it may be collected directly by the respective Partner **Banks or NBFCs**, subject to their own privacy policies and compliance requirements.
- d. **“Personal Information”** includes any information that is directly or indirectly available to us and can be used to identify or verify an individual’s identity. This may include, but is not limited to, your name, mobile number, email address, gender, date of birth, and location. It may also include government-issued PAN number. Additionally, it includes any information voluntarily provided by you while using the Platform’s features such as budgeting, goal setting, and expense tracking
- e. Categories of data/ information which We, the Affiliates and our associate/ affiliate entities/ Partner Banks and NBFCs may collect/receive/ share/ process/ use/ store in order to serve You through the Platform:

Personal Particulars - Full name, age, user ID, gender, and date of birth.

Contact Information -Telephone/mobile number(s), address, state/city of residence, country, pin code, email address.

Identification Information - Permanent Account Number (PAN)

Information in Your device(s) - We may also access Your contact list, SMS, camera, media files and location data in Your devices for various purposes after seeking necessary permissions.

Additional Information – In specific scenarios where a user expresses interest in certain bank products such as home loans or personal loans through the Explore section of the Platform, we may collect screenshots or PDF receipts of transaction details submitted voluntarily by the user. This data is not collected for all bank products, but only when the user chooses to connect with a bank or NBFC and proceeds to share information for the purpose of initiating a financial product inquiry. The collected documents are then shared with the respective Partner Banks or NBFCs solely for the purpose of conducting preliminary eligibility checks and enabling their teams to assist users accordingly. This information is processed securely and only with the user's explicit consent.

f. You hereby agree, acknowledge, and grant your consent to us to collect information or data provided by you through the Wise Banker Platform, including through forms, surveys, online requests, and other interactive fields. Furthermore, you agree and consent to our collection and sharing of such information with **third-party entities**, including but not limited to our **affiliate/partner entities, NBFCs, and banks**, solely for the purpose of:

- Connecting you with the relevant sales or support teams of the financial institutions you express interest in;
- Assisting with the **eligibility assessment** for selected financial products (such as home loans or personal loans), if you voluntarily share supporting documents or data;
- Enhancing your experience on the Platform and improving product recommendations and insights;
- Analyzing usage patterns to introduce new tools, features, or services; and
- Fulfilling any applicable **regulatory or contractual obligations** related to the services offered via the Platform.

Wise Banker does not directly provide financial products or services, and any such interactions are facilitated through the respective financial institutions in accordance with their terms and privacy policies.

g. You acknowledge that You are over 18 years of age and are providing Your Personal Information of Your free will.

h. You acknowledge that We may keep records of communications, including phone calls received and made for making enquiries, orders, feedback or other purposes for rendering services effectively and efficiently. The Company will be the exclusive owner of such data and records. You hereby consent and authorize us to publish feedback obtained from You on the Platform. However, all records are regarded as confidential. Therefore, such records will not be divulged to any third party, unless required by law.

Purpose and Use of Your Data

We recognise and acknowledge the value and importance of the protection of Your Personal and Non-Personal Information and ensure that the same will be used for the intended purpose(s). By virtue of this Privacy Policy, We will collect/ receive/ share/ process/ use/ store Your Personal Information and/or Non-Personal Information in accordance with applicable laws to provide You with the Offerings on the Platform, enhance the user experience, manage our relationship with You, build affluence scores/ user insights, analyse data for the introduction of new services and features, and as may be required to comply with any regulatory requirements and contractual obligations, which may inter alia include:

- 1. Personal Finance Management**

To enable key features of the Platform such as categorized expense tracking, goal setting, daily limits, and insights into your spending behavior.

- 2. Support and Issue Resolution**

To respond to your queries, resolve concerns, and provide customer support while you use the Platform.

- 3. Financial Product Exploration**

To connect you with banks and NBFCs when you express interest in a specific product such as personal loans or home loans. We may collect supporting documentation (e.g., transaction receipts or screenshots) shared voluntarily for eligibility checks and forward them to the concerned institutions.

- 4. Marketing and Communications**

To inform you about relevant product offers, updates, features, or marketing content related to the Platform's offerings.

5. Usage Analytics

To track, analyze, and maintain records of how you interact with the Platform for improving performance and functionality.

6. Product & Feature Enhancement

To conduct analytics aimed at developing, upgrading, or personalizing the Platform, including its security, service quality, and content strategies.

7. Business Operations and Infrastructure

To manage internal operations, ensure compliance with company policies, and support administrative processes.

8. Regulatory and Legal Compliance

To comply with applicable laws, rules, directives, and lawful requests from government, tax, or law enforcement authorities.

9. Enforcing Our Terms

To enforce agreements and terms of service, and take necessary action in the event of any misuse or policy violations.

10. Disclosing Personal Information about You to our representatives, service providers and other third parties to comply with applicable laws and regulations. We reserve the right to disclose Your Personal Information to third parties in an anonymous or aggregate form, upon the consent of the User, to understand customer trends and patterns and manage and improve our business relationships. We provide Your Personal Information to our business partners, representatives and third-party processors to administer and process for the purposes notified to You in this Privacy Policy, and We may also share such details with third parties (such as auditors or legal advisors) to obtain professional advice. Any such processing will be governed by an agreement in the form required by law, preserving any and all of Your statutory data protection rights. You authorize us to exchange, transfer, share, or part with all or any of Your Personal Information, across borders and from Your country to any other countries across the world with the Affiliates/ agents/ third party service providers/ Partner Banks and NBFCs and financial institutions for the purposes specified under this Privacy Policy or as may be required by applicable law.

11. Use as Permitted by Law or Consent

To use your data in other ways permitted under the law or for which you have explicitly given consent

12. Cookie-Based Data Collection

To collect information through cookies to understand user behavior, diagnose issues (like slow response times), and enhance your experience on the Platform.

13. Prevention of Fraud and Abuse

To investigate and prevent potential illegal activities, fraudulent transactions, or abuse of the Platform.

You understand, acknowledge and expressly grant Us Your consent:

1. To share/ receive Your Personal Information and/or Non-Personal Information with/from Us/ affiliate entities/ business partners, for the purposes which are not limited to providing You with the Offerings on the Platform, improving the existing Offerings on the Platform, enhancing the user experience, building affluence scores/ user insights, outsourcing relationship management activities, analysing data for the introduction of new services and features, and as may be required to comply with any regulatory requirements and contractual obligations.
2. To share Your Personal Information and Non-Personal Information with the companies that We plan to merge with or entities that We may acquire or be acquired by subject to the provisions of applicable law, in which situation We will require that the new combined entity or the acquired/ acquiring entity follows this Privacy Policy with respect to Your Personal Information.
3. To collect/ receive/ process/ use/ store certain Personal Information (including PAN, date of birth, residential status, etc.) that You may have shared with the Company or the Affiliates or any other subsidiary company that may be incorporated in the future, in order to allow Us to provide the Offerings on the Platform to You. Further, You expressly consent that certain Personal Information that may be shared by You with Us, including financial information (such as debit card details or other payment mode details), or Your information that may be collated by Us from the KRAs may be shared with the Company, the Affiliates, the Partner Banks and NBFCs and affiliate entities or any subsidiary company that may be incorporated in the future, in order to facilitate the provision of our Offerings on the Platform to You.

Links to Other Sites

- a. Links to third-party advertisements, third-party websites/ applications/ products/ services or any third-party electronic communication service ("Other Websites") may be provided on the Platform which is operated by third-party entities and is not controlled by, or affiliated to, or associated with Us unless expressly specified on the Platform.

- b. We are not responsible for any form of transmission, whatsoever, received by You from any third-party website. Accordingly, We do not make any representations concerning the privacy practices or policies of such third-party entities or terms of use of such Other Websites, nor do We control or guarantee the accuracy, integrity, or quality of the information, data, text, software, music, sound, photographs, graphics, videos, messages or other materials available on such Other Websites. The inclusion or exclusion does not imply any endorsement by Us of the Other Websites, the websites provider, or the information on such Other Websites. The information provided by You to such Other Websites shall be governed in accordance with the privacy policies of such Other Websites, and it is recommended that You review the privacy policy of such Other Websites prior to using such websites.

Data Retention

Notwithstanding anything to the contrary mentioned elsewhere in the Privacy Policy, We may store/retain Your Personal and Non-Personal Information for as long as the same is required for the fulfilment of purposes for which We collected it. The retention of Your Personal Information and/or Non-Personal Information by Us is determined by considering compliance with legal (contractual, statutory or regulatory requirements), accounting and compliance reporting requirements. Retention of Your Personal Information and/or Non-Personal Information will also be applicable pursuant to cancellation/ deactivation/ non-subscription of Your designated investment account with Us.

Your Rights

We seek to provide reasonable assistance to cater to request(s) from You regarding the processing of Your Personal Information and the right to amend and withdraw permission to the processing/ use/ storing/ sharing of Your Personal Information. In accordance with applicable laws and as per the terms of this Privacy Policy, You may exercise the following rights:

- Access the information We hold about You, or get a copy of it in a portable (machine-readable) format or request Us to send it to a third party.
- Review or rectify the inaccurate Personal Information stored with Us.

- Ask Us to update/delete Your Personal Information. However, You understand that the deletion of certain information may impact the Offerings on the Platform being offered to You and the same may result in total suspension of the Offerings on the Platform if the deleted information is of a category that is considered mandatory to provide the Offerings on the Platform.
- Some of our Offerings on the Platform allow You to upload, submit, store, send or receive content. When You upload, submit, store, publish, send or receive content to or through our Offerings on the Platform, You provide us with Your consent to utilise such content, including for our marketing purposes, subject to our Privacy Policy.

Such content must not:

- Be harmful, harassing, blasphemous, defamatory, obscene, pornographic, paedophilic, libellous, invasive of another's privacy, hateful or racially or ethnically objectionable, disparaging, and relating to, or encouraging money laundering or gambling
- Harm minors in any way.
- Infringe any patent, trademark, copyright or other intellectual property rights.
- Deceive or mislead the reader about the origin of such messages or communicate any information that is grossly offensive or menacing in nature.
- Contain software viruses or any other programs designed to interrupt, destroy or limit the functionality of another computer or mobile device.
- Threaten the unity, integrity, defence, security or sovereignty of India, friendly relations with foreign states, or public order.
- Cause the incitement to commit any offence or prevent the investigation of any offence.
- Be insulting to any other nation.
- Impersonate another person.
- Violate the provisions of the Information Technology Act, 2000 and rules and regulations thereunder or any other applicable laws.

You can exercise any of the aforementioned rights by submitting a request to wisebankerinfo@gmail.com

You understand that these rights are limited in some situations, such as, where We are legally or otherwise bound to process/ retain/ share/ disclose Your Personal Information. This may also affect our ability to provide You Offerings on the Platform and therefore may lead to discontinuation of the Offerings on the Platform You avail from the Platform.

Security Precautions

1. We work to protect the security of Your Personal Information during transmission by using appropriate software, which encrypts the information You input. This encrypted information is stored on secure servers and data centres. Further, We ensure that the number of employees involved in the management of the data centre who have physical access to these computers is limited. Also, We use advanced security technology to prevent our computers from being accessed by unauthorized persons.
2. We have also implemented information security practices and standards and have in place information security programmes and policies containing managerial, technical, operational and physical security measures that are in compliance with the applicable laws including, so as to protect the information provided to Us from unauthorized access, use, modification, damage, disclosure or impairment. Further, We may from time to time use reasonable additional or alternative procedures to ensure the security and confidentiality of Your Personal Information through our Platform.
3. Notwithstanding the above, We are not responsible for the confidentiality, security or distribution of Your Personal Information by third parties outside the scope of our agreement with such third parties. Further, We will not be responsible for any breach of security or for any actions/omissions of any third parties or events that are beyond our reasonable control, including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service of the User etc.
4. No data transmission over the Internet is fully secure, so You acknowledge that We cannot ensure or warrant the security of any information You submit to us. Further, We do not guarantee in any way, the security of any information that You transmit or share on the Platform; and You do so at Your own risk.

Changes to Privacy Policy

We reserve the unconditional right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. In case, any changes are made in the Privacy Policy, We shall update the same on the Platform. Please revisit the Platform periodically for the latest information on our privacy practices. Once posted, those changes are effective immediately unless stated otherwise. Continued access or use of the Platform or availing of the Offerings on the Platform constitutes Your acceptance of the changes to the amended Privacy Policy. However, if You do not agree with the changes, please do not continue to use the Platform or avail of the Offerings on the Platform or submit Your Personal Information to Us and notify Us about Your disagreement over an email

wisebankerinfo@gmail.com . Subsequently, upon confirmation from the Company, Your access to the Platform will be suspended.

Contact Us

You can contact us on Email: wisebankerinfo@gmail.com

