POOLPAY PRIVACY POLICY

(Registered as Avyanga Ventures Private Limited)

Introduction

Avyanga Ventures Private Limited ("Company" or "We") respects your privacy and is committed to protecting it. Please read this privacy policy ("Policy") carefully to understand our practices regarding your information. By installing and accessing or using the PoolPay, you agree to this Policy.

This Policy describes (i) the types of information we may collect when you install, and access, and/or use the features of PoolPay; (ii) how we use that information, and the purposes for which we collect it; and (iii) how we disclose such information.

This Policy applies only to information we obtain from you through the PoolPay.

Information we collect and how we collect it

We collect information from and about users of PoolPay as stated herein.

- 1) Information you provide to us with prompts
 - If you elect to install, launch, access and/or use PoolPay, we may ask you to provide certain information to create your account such as name, mobile number, email address, date of birth and gender. You may also provide PoolPay with additional information such as your PAN number.
- 2) Other Information we may collect without prompts
 - a) PoolPay usage details. Details of your access to and use of the PoolPay, including interaction data, logs of access and usage, and other performance data and the resources that you access and use on or through the PoolPay app
 - b) Device id
 - c) Information provided through surveys displayed on PoolPay
 - i) PoolPay may display certain marketing surveys or survey related applications to you where you are requested to fill in a survey, at your election, for services or products that you use

- or request to provide your opinion regarding certain products or services
- ii) Some of the data sets may be considered to be personal information/data, as per privacy laws in certain jurisdictions. Where you elect to provide such information/data, you consent to the use thereof by PoolPay by such election. To the extent such information/data is determined to be or becomes personal data/information as per privacy laws applicable to you, we will ensure compliance with such privacy laws in our collection, processing or use of the information/data including certain data subject rights if any, that you may enjoy under such privacy laws.

How Your Information is used

We may use information that is collected about you or that you provide, to (collectively referred to as "Permitted Purposes"):

- a) Provide you with PoolPay's features and its contents, such as account creation, maintaining profile page and showing relevant content
- b) Make disclosures in the event of merger, sale, other asset transfers or other relevant corporate transactions. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

Disclosure of your information for Permitted Purpose

1) Legal Disclosures. We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to comply with law enforcement or national security requests and legal processes, such as a court order or subpoena; protect your, our or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us, or assist with an investigation or prosecution of suspected or actual illegal activity.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the information you provide to us. You may elect to disable, uninstall or unsubscribe from PoolPay.

Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make any material changes, we will notify you by means of a notice prior to the change becoming effective. Please check our Privacy Policy regularly to ensure you have read the latest version.

Contact Information

To ask questions, exercise applicable data subject rights, seek deletion of your data, or comment about this Policy and our privacy practices, please e-mail us at support@poolpay.in