

Gullak Privacy Policy

1. Scope

- a. We ask that you read this Privacy Policy ("Privacy Policy") carefully as it contains important information about who we are, how and why we collect, use, store, transfer and share personal information, your rights in relation to your personal information, and how to contact us. This Privacy Policy should be read alongside, and in addition to the Gullak Terms of Service ("Terms"), and any separate product or service agreement entered into between us from time to time.
- b. Where we have used but have not explained the meaning of a capitalised term in this Privacy Policy, that capitalised term has the same meaning as mentioned under the Terms. Whenever we refer to 'information' or 'data' under this Privacy Policy, we refer to your personal information (described in 'Personal Information we collect'). Whenever we refer to the 'law' under this Privacy Policy, we are referring to those laws as amended from time to time.
- c. By accessing our Services, using any medium: mobile app, mobile site, website, web app, or otherwise, you consent to us using your personal information in the way described in the Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use or access our Services.
- d. This Privacy Policy is divided into the following sections:
 - i. Who we are
 - ii. How to contact us – Grievance Officer
 - iii. Personal information we collect
 - iv. Where we collect personal information
 - v. How we use your personal information
 - vi. Who we share your personal information with
 - vii. Period for which we retain your personal information
 - viii. Cookies and similar technologies
 - ix. Your rights
 - x. Security practices
 - xi. Updates to the Privacy Policy

2. Who we are

In this Privacy Policy, us, our, we, or Gullak means Finplex Systems Private Limited, a company incorporated under Indian laws, having its office at 5, SH 49A, Tharamani, Chennai, Tamil Nadu 600113. We operate and manage the Gullak App. In doing so, we collect, process, store and are responsible for certain personal information about you. When we do so, we are regulated by the Information Technology Act 2000, the Information Technology (Reasonable Security Practices and Procedures for Sensitive Personal Data and Information) Rules 2011, and other Applicable Law.

3. How to contact us - Grievance Officer

If you have any questions, concerns or suggestions about how we collect, store or use your information, you can reach out to our Grievance Officer. This Grievance Officer will serve as the designated Grievance Officer under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011.

Name: Yashraj Singh

Email ID: yashraj@gogullak.com

Phone number: 07737114933

Address: Cabin 8, 5, SH 49A, Tharamani, Chennai, Tamil Nadu 600113

4. Personal information we collect

Personal information means any information of a natural person which can assist in identification of that person. Below is a list of types of information that we may collect when you use the Gullak App or Services.

Type of personal information	Description
Contact	Your name, phone number, email ID, address and other ways in which to contact you.
Profile details	Details such as date of birth, gender, marital status, official identity documents etc. that you enter to use the Gullak App and avail any products or services.
Transactional	Details about the transactions you carry out on the App.
Contractual	Details to offer the Schemes to you through the Gullak App.
Locational	Data we get about where you are. This may come from your mobile phone or other electronic devices.
Technical	Details about the devices and technology you use such as 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.
Communications	What we learn about you from the communications between us, including any feedback that we may receive from you.
Public and third-party data	Details about you that are publicly available on the internet. We may also receive information about you from third-parties like business partners, technical sub-contractors, analytics providers, search information providers etc.
Usage data	Data about how you use the App and interact with our Services including through the use of cookies or other tracking software. This includes data such as access dates and times, App features or pages viewed, App crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with our Services.
Consents	Any permissions, consents or preferences that you give us on our App or otherwise.

6. How we use your personal information

We use your personal information for:

- a. Serving you
 - i. Managing our relationship with you or your business, including to provide Services to you, to conclude transactions, to generate and maintain user profiles, and to provide personalised features/ content of interest to you.
 - ii. Communicating with you about our and Merchants' products and services, and responding to your requests/ queries, through calls, SMS messages, emails, App notifications or other means.
 - iii. Developing and carrying out marketing activities.
 - iv. Studying how customers use our App and Services.
 - v. Delivering promotional offers including contacting you through calls, SMS messages, emails, App notifications or other means.
- b. Improving our business
 - i. Testing new products.
 - ii. Analytics and research and otherwise improving our products and services.
 - iii. Managing how we work with other businesses that provide services to us and our customers.
 - iv. Developing new ways to meet our customers' needs and to grow our business.
- c. Managing our operations
 - i. Delivering our and Merchants' and Regulated Partner's products and services.
 - ii. Marketing and outreach, such as offering you special offers or other products or services we think that you may be interested in.
 - iii. Collecting and managing fees and other charges.
 - iv. Collecting and recovering money that is owed to us.
- d. Fraud prevention and managing risks
 - i. Delivering our and Merchants' and Regulated Partner's products and services.
 - ii. Marketing and outreach, such as offering you special offers or other products or services we think that you may be interested in.
 - iii. Collecting and managing fees and other charges.
 - iv. Collecting and recovering money that is owed to us.
- e. Business management
 - i. Operating our business in an efficient way, including managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit.
 - ii. Carrying out our obligations arising from and exercising our rights set out in our contracts.

7. Who we share your personal information with

We do not share any sensitive or personal data about you with any third parties unless necessary. We will only disclose personal information to third parties for the reasons explained in this Privacy Policy or otherwise in the Terms. Below is a list of the types of third parties that we may share your personal information with.

- a. Gullak group
We may share your personal information with our group companies if that helps us with any of the purposes noted above or otherwise in the Terms.
- b. Gullak Partners
We may share your information with businesses that we partner with to provide you our Services ("Gullak Partners"). These include but are not limited to our Regulated Partners who hold your funds and Merchants who offer you Schemes. The Gullak App may host links to third party websites. We are not responsible for the content, activities or services related to such linked websites.

- c. **Authorities**
We may share your information with any government authority, regulatory body or law enforcement agency which seeks such information if we believe the disclosure is required or appropriate under Applicable Laws.
- d. **Service providers**
We may share your information with third party service providers to provide our Services to you and to run our business. This includes vendors, agents, sub-contractors, suppliers, consultants, advisers and other service providers. If you select a Scheme which offers Rewards, we will share your data with the Rewards providers.
- e. **General business**
We may share your information with third parties to grow and improve our business. This includes:
 - i. Companies we have a joint venture or agreement to co-operate with.
 - ii. Organisations that introduce you to us.
 - iii. Market researchers.
 - iv. Advisers who help us to come up with new ways of doing business.
 - v. Advertisers and technology providers that you use (such as third-party websites you visit, social networks, and providers of apps and smart devices).
 - vi. 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.
 - vii. Other financial institutions to help prevent, detect and prosecute unlawful acts, money laundering or fraudulent behaviour.
- f. **Sharing anonymised data**
We may share anonymised data with other companies, but only after scrubbing all personally identifiable details and converting it into a format where it is no longer considered personal information under the law (as it is anonymised).

8. How long we keep your personal information

- a. We will keep your personal information as long as it is necessary to provide you Services on the Gullak App (for the purposes listed in 'How we use your information'). We will retain and use the information collected as necessary to comply with our obligations under Applicable Laws or contracts, resolve disputes or for other business purposes.
- b. To ensure compliance with Applicable Laws, we may need to retain information even after you have terminated your account with us or stopped using the Gullak App. We may also keep your contact information and other details for fraud prevention and for the exercise/defence of a legal claim or for providing evidence in legal proceedings.
- c. Post termination, we may continue to use your anonymised data which is aggregated or combined with anonymised data of other users. We use this for analytics, research and other business purposes.

9. Cookies and similar technologies

- a. We may use cookies to distinguish you from other users of our Services. This helps us provide you with a good experience, and also allows us to improve our Services. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device when you visit our website or App. Cookies send information back to the originating website on each subsequent visit, or to another website which recognises that cookie. Cookies also make it easier for you to log in and use our website or App.
- b. We may use the following cookies:

- i. Strictly necessary cookies required for the operation of our website or App (including, for example, cookies that enable you to log into secure accounts and use interactive features).
- ii. Analytical/performance cookies that allow us to recognise and count the number of visitors and users and see how they use the website or App to (for instance, without limitation) help us improve the way our website or App work or are provided, by ensuring that users are finding what they are looking for easily.
- iii. Functionality cookies to help us recognise you when you return to our website or App to (for instance, without limitation) personalise our content for you, greet you by name and remember your preferences, such as choice of language or region.
- iv. Targeting cookies to record your visit to our website or App, the pages you have visited and the links you have followed. We may use this information to make our website or App and the information displayed on it, more relevant to your interests. We may also share the information with third parties for this purpose.

10. Your rights

You will have the following rights with regard to your data and you can exercise these rights by writing to our Grievance Officer at yashraj@gogullak.com.

- a. Confirmation: You can ask us to confirm if we are processing your personal data.
- b. Review: You can ask us for a copy of your personal data held by us.
- c. Rectification: You can inform us about changes to your personal data, and ask that we correct any erroneous or incorrect personal data held by us. We are not responsible for the authenticity of the data you provide us. Please ensure you notify us without undue delay of any changes to the personal data that you have provided to us by updating your details on the App or by contacting our Grievance Officer at the details provided in this Privacy Policy.
- d. Restrictions on Processing: You can ask us to erase your personal data, block or restrict the processing of your personal data, or object about specific ways in which we use your personal data.
- e. Right to Opt Out: We or our service providers may communicate with you through voice calls, text messages, emails, App notifications, or other means. The communication may relate to (a) Services (as defined in the Terms of Use), (b) promotional offers, or (c) any other information that we may want to share with you. You may opt out of receiving information about promotional offers by writing to us. But even if you opt out of receiving information from us, we may still send you non-promotional communication.
- f. Withdrawal of Consent: You have the option to withdraw consent given to us for collection and processing of your personal data. In such cases, we reserve the right to stop providing Services for which your personal data was sought. Your withdrawal will become effective when you receive an acknowledgment from us. You understand that despite your request to withdraw consent, we may still need to retain some data about you for complying with Applicable Laws.

11. Security Practices

We deploy adequate technical and organisational security measures to protect your personal information. Some of these include: firewalls, encryption, and access controls. However, we do not guarantee that personal data will be completely protected. Any transmission of personal data by you is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained in the Gullak App, including through the illegal acts of third parties.

12. Updates to this Privacy Policy

We may update this Privacy Policy from time to time at our discretion. We urge you to keep visiting this page so you remain updated about the changes, if any.

This Privacy Policy was last updated on 11th July 2022.