

Privacy Policy

At “**Choice Finserv**” (collectively referred to as “the Company” hereon), we value your trust and respect your privacy.

This Privacy Policy provides you with details about the manner in which your data is collected, stored and used by “**Choice Finserv**”. You are advised to read this Privacy Policy carefully. By visiting Company’s website(s) & mobile application(s), you expressly give us consent to use and disclose your personal information in accordance with this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use or access the Company’s website(s) or mobile application(s).

I. General

This privacy statement applies to the website(s) of the Company, or any online/mobile application(s) that refer to or link to this Privacy Policy (collectively, our “Services”). This Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, television or any other media or computer resource to access our Services. It is important that you read the Privacy Policy carefully because anytime you use our Services, you consent to the practices/ policies that we have set out in this Privacy Policy.

II. Personal Information

Personal Information means and includes, all information that can be linked to a specific individual or to the identity of any individual, including but not limited to, name, address, mailing address, telephone number, email ID, bank account details including details information about your mobile phone, any details that may have been voluntarily provided by the customer, whether to Unique Identification Authority of India (UIDAI), Credit Information Bureau of India Limited (CIBIL) or any other agency including any other Credit Information Companies.

Provided that, any information that is freely available or accessible in the public domain or furnished under the right to information act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for this policy.

III. Use of Personal Information

Personal Information collected shall be used for the relevant lawful purposes connected with various functions or activities of the company related to services in which the customer is interested, and/or to help determine the eligibility of the customer.

We use personal information to provide you with our services, to resolve disputes, troubleshoot concerns, help promote safe services, assess your interest in our services, inform you about offers, products, services, updates, customize your experience, detect and protect us against errors, fraud and other criminal activity, enforce our terms and conditions, etc. We may also use your personal information to send you offers regarding various services/facilities which the Company may, from time to time, launch. We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, gender, etc.). We use this data to customize your experience at “Choice Finserv”.

IV. Disclosure

We will not voluntarily disclose your personal information to any third party except as provided herein:-

- We may disclose your data to any third parties for KYC Authentication, Loan Processing, for Underwriting, enabling customer support enabling communication between the customer and the company or any other similar purpose.
- We may also disclose your information to a third party as part of a merger or transfer or any restructuring. We may disclose Information to any of the Company associates and affiliates, without any limitation and you hereby give consent for the same.
- Moreover, we may also disclose the data if we are required by court order, by Government Authorities, by law enforcement authorities or by other legal processes or where it becomes necessary to do so to protect the rights or property of the Company and our affiliates, etc.
- Further company is required to disclose the personal information to a third party on a need-to-know basis, provided that in such case the company shall inform such party of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of the company. The details of the third party to whom we share your data is mentioned in **Appendix-1**.

V. Cookies

A “cookie” is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. The Company’s website(s) uses cookie and tracking technology depending on the features offered. No personal information/ data/details will be collected via cookies and other tracking technology; however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties. You may also be able to opt out of certain cookies through third-party cookie management sites. Disabling cookies may prevent you from using certain parts of our website.

The company is not responsible for cookies placed on the device of user/s by any other website and information collected thereto.

VI. Password policy

Do help us protect your privacy by maintaining the secrecy of the username and password you use for any of our Services.

VII. Changes to this Privacy Policy

“Choice Finserv” reserve the right to change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested to review the Privacy Policy periodically, to make sure that you are aware of any such changes. This Privacy Policy shall apply uniformly to the company’s website(s) and mobile application(s) or any other media used by the Company for its Services. Any changes or updates will be effective immediately upon posting the same on our website at <https://choiceindia.com/>.

VIII. Data protection and Privacy

We take reasonable steps to ensure that information about you is available only for so long as is necessary for the purpose for which it is processed, or longer if required under any contract, by applicable law, or for statistical purposes, subject to appropriate safeguards. Further, you shall also have the option to either accept, deny or revoke the consent for use of any specific data along with the option to delete any data collected by the Company.

We have taken reasonable measures to protect security and confidentiality of customer information and its transmission through electronic medium. However, while using our application and services, you are required to follow standard procedures and guidelines in respect of managing security and confidentiality of your data. Further, the company may at its discretion destroy records, information and information system equipment no longer required for business activities.

Access to work areas containing sensitive information is restricted to authorized personnel only and access to IT hardware is password protected. Access to customer’s sensitive information is restricted and access to this information is provided on least privilege basis. Control mechanism is in place ensuring access to sensitive information only to relevant personnel. Further, basis segregation of responsibilities, maker checker concept has been adopted from control mechanism perspective. In case of data breach, the company shall adopt the reasonable measures to handle the security breach as per their internal norms.

For system and database administration and security, we implemented certain necessary actions which includes but not limited to-

- Only necessary ports are kept open
- HTTPS is preferred over HTTP
- Server keypairs are changed periodically
- Passwords and passphrases are kept strong
- Regular review of unsuccessful logins
- System backup
- Sensitive information is encrypted and transmitted securely
- Any other action required for the security of database.

IX. Data Security Practice

We use requisite technical and organizational security measures to ensure a level of protection for personal data. For the same, the protection for data appropriate to the nature, scope and purpose of processing personal data, the risks associated with such processing, the likelihood and severity of the harm that may result from such processing. The transfer of personal data between your end device and us is carried out via best-in-class encryption protocols.

X. Period of storage of the Data

Choice Finserv will keep the Data collected about you for as long as required for the purposes set out above or even beyond the expiry of Choice Finserv's transactional or account-based relationship with you which may extend for the period of 10 years. The data can be stored for longer period if (a) as required to comply with any legal and regulatory obligations to which we are subject, or (b) for establishment, exercise or defence of legal claims.

XI. Data Retention

We shall retain the information you provide to facilitate your smooth and uninterrupted use of the App, and (i) to provide, improve and personalize our Services; (ii) to contact you about your account and give customer service; (iii) to personalize our advertising and marketing communications; and (iv) to prevent, detect, mitigate, and investigate fraudulent or illegal activities. We do not retain your personal data for longer than required for the purpose for which the information may be lawfully used.

XII. Destruction of Documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/ unimportant/ irrelevant. This applies to both Physical and Electronic Documents. Periodically destruction of documents can be undertaken with the approval of HOD of the concerned department.

XIII. Third-Party Links and Content on our Services

Our Services may link to third-party websites and services that are outside our control. Further, the Company, its affiliates, and their directors and employees accept no liability and will not be liable for any loss or damage arising directly or indirectly (including special, incidental or consequential, punitive, or exemplary loss, damage or expenses) from your use of any mobile application or any site or inability to use by any party, howsoever arising, and including any loss, damage or expense arising from, but not limited to, any defect, error, omission, interruption, imperfection, fault, mistake or inaccuracy with any mobile or online application, its Contents (material, information, data, money market movements, news items, etc.) or associated services, or due to unavailability of any application or any part thereof or any Contents or associated services even if the Company is advised of the possibility of such damages, losses or expenses.

XIV. Intellectual Property Rights

Please note that “Choice Finserv” retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all information provided on or via this website (including all texts, graphics and logos). Except as permitted by the company, user shall have no right to use any of the Company IP rights and user shall be fully responsible for loss or damage suffered by the company for unauthorised use of IP rights.

XV. Consent

You consent to the collection and use of the information you disclose to “Choice Finserv” in accordance with this Privacy Policy, including but not limited to your consent for sharing your information as per this Privacy Policy.

XVI. Disclaimer

Kindly note that “Choice Finserv” do not collect personal information about individuals except when such individuals specifically provide such information voluntarily. Upon such voluntary disclosure of personal information, we may further verify, collate or receive information about you from publicly and commercially available sources (as permitted by law), which we may combine with other information we receive from you. We may also receive information about you from third-party social networking services if you are already connected with those services. The Company shall, at all times, ensure to implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of your personal data and information as the same is of vital importance to the Company. At “Choice Finserv”, we are strongly committed to protecting the personal and financial information that you submit to us. Personal information of individual users will not be sold or otherwise transferred to unaffiliated third parties without your approval at the time of collection. However, please note that although we take

reasonable steps to protect your information, no website, internet transmission, computer system or wireless connection is completely secure.

“Choice Finserv” shall ensure to safeguard the security and confidentiality of any information you share with us. Any of your personally identifiable information obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your personal information, “Choice Finserv” cannot warrant the security of any information you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your personal information is done at your own risk.

Your information/inputs/queries as a registered user are required to serve you better and the same shall not be shared with anyone without your consent. Your aforesaid information may be further used for assessment and analysis of our market, customers, products, and services and to understand the way people use our Services so that we can improve them and develop new products and services. However, it shall be on the basis that the agents are required to keep the information confidential and will not use the information for any other purpose other than to carry out the services they are performing for “Choice Finserv” and our affiliates.

XVII. No contractual obligation

Please note that this Privacy Policy does not create any contractual or other legal rights on or on behalf of any party, nor is it intended to do so.

APPENDIX- 1

Details of the third parties we share your personal information with are set out below:

S.NO.	NAME OF THIRD PARTY	ADDRESS
1.	Karza Technologies Private Limited	1302, Orchid, Campacola Compound, 18 BG Kher Road, Worli, Mumbai, 400018
2.	Digitech Solutions Private Limited	Flat C-1603, Oak Block, Salarpuria Greenage Apts Bomanhalli, Hosur Main Road, Bangalore - 560068. Karnataka
3.	Transunion CIBIL Limited	19th Floor, One World Center, Elphinstone Road, Mumbai 400 021, Maharashtra, India (CIR)
4.	Moshpit Technologies Private Limited	501-G, Maple Heights, Sushant Lok-1, Block C, Gurgaon< Haryana- 122 002
5.	Signzy Technologies Private Limited	603 Coworking,Marathon Innova Corporate Centre,101 ,C Wing, Ganpatrao Kadam Marg, Next Gen, Lower Parel,Mumbai- 400013
6.	Paytm Payments Services Limited	136, First Floor, Devika Tower Nehru Place New Delhi South Delhi DL 110019 India
7.	AU Small Finance Bank	19-A, Dhuleshwar Garden, Ajmer Road, Jaipur – 302001, Rajasthan
8.	Pravaa Infosystems	No. 48, 3 rd Floor, RV Road, Basavanagudi, Bengaluru, Karnataka – 560004
9.	GupShup Technology India Private Limited	Unit 101, 1st Floor, Silver Metropolis, Western Express Highway, Goregaon (E), Mumbai 400063, India
10.	Choice Equity Broking Private Limited	Sunil Patodia Tower, Plot No. 156-158 J.B. Nagar, Andheri (East) Mumbai Mumbai City MH 400099
11.	Central Depository Services (India) Limited	Unit No. A-2501, Marathon Futurex, Mafatlal Mills Compound, N.M. Joshi Marg, Lower Parel (E) Mumbai Mumbai City MH 400013 IN

12.	Computer Age Management Services Limited	New No.10, Old No.178, M.G.R.Salai, Nungambakkam Chennai TN 600034 IN
13.	CKYC - Central Registry of Securitisation Asset Reconstruction and Security Interest of India	Tower – 1, Office Block, 4th Floor, Plate-A, (Adjacent to Ring Road), NBCC, Kidwai Nagar East, New Delhi –110023
14.	NSDL E-Governance Account Aggregator Limited	Times Tower, 1st Floor, Kamala Mills Compound, Senapati Bapat Marg, Lower Parel Mumbai Mumbai City MH 400013 IN
15.	Razorpay Software Private Limited	1st Floor, SJR Cyber, 22 Laskar Hosur Road, Adegodi Bangalore Bangalore KA 560030 IN