# **Privacy Policy**

```
The
Paisayaar
online
digital
lending
platform
("Paisayaar")
is
owned
and
operated
by
JingleCred
Digital
Finance
Limited,
company
incorporated
under
the
provisions
of
the
Companies
Act,
2017,
holding
CUIN
0214242
("Company")
and
licensed
as
а
non-
banking
finance
company
with
license
SECP/LRD/78JDFL/2022-
85.
The
Company
is
engaged
in
the
business
of
providing
micro
and
nano-
loans
to
its
customers
in
Pakistan
through
the
Paisayaar
APP
on
Google
play
(which
term
includes
the
Paisayaar
mobile
application
(the
"Application")
```

only. The Company is  ${\tt committed}$ to protecting and respecting your privacy. This Privacy Policy has been formulated assist you to understand how your personal information will be collected, stored and processed by the Company when you visit the Website or Application. All users customers of the Website or Application are advised to read and understand

this Privacy Policy carefully, as by accessing the Website or Application you agree to be bound by the terms of

this Privacy Policy and consent to the collection, use, disclosure, storage, and protection of your personal information accordance with this Privacy Policy, or any changes made hereto. This Privacy Policy

subject to change or modification from time to time without prior notice and it is advised that you regularly

as available on the Application or Website

Website to

review our Privacy Policy

keep up to date with any changes

made.

References below to "you" or "customer"

shall mean any visitor, user, business partner, agent, supplier, vendor or customer of the Company or its Application or Website and shall include а "User". References to "we" or "us" shall mean the Company and/or the Paisayaar Platform.

## 1. When this Privacy Policy applies.

1.1 This Policy applies when you access, signup, provide information, upload or supply  ${\tt documents}$ or otherwise use or subscribe to the Company's products, services, applications, websites or

networks, all of which

are subject to the terms of this Privacy Policy. This includes data, video, advertising, internet and other products, services and applications. This Privacy Policy also applies to other websites owned or operated by the Company.

1.2 This Privacy Policy also applies to you and anyone who uses our products or services under your account, except where we identify that а separate privacy policy

sure you understand this Privacy

conditions apply.
You are

responsible

or terms and

for making

Policy. 1.3 You must agree to and be willing to accept the terms of this Privacy Policy before you may visit or use the Paisayaar Platform, or any products or services offered therein. 1.4

This Privacy Policy and any additional terms of use apply to you even if you are not our customer and you interact with us as part of running our business,

a.
accessing
any
of
our
products
or
services

such as by:

accessible through any Paisayaar Platform; b. when using any of our products or services; generally enquiring about our services or products. d. when entering promotion; e. when calling our help desk; or f. when you download the Paisayaar mobile application, or signup or create an account Paisayaar or any other mobile application belonging to the Company. 1.5 If you need to give us personal information about someone else

in relation to our products and services, this Privacy Policy will also apply. 1.6 Depending on the product services, you may also receive servicespecific and/or regionspecific terms. You will be legally bound by both this Privacy Policy and the service/region specific term to the extent that you have accepted them when signing up to any service or product; therefore, you are required to read these terms carefully. 1.7 Ιt is your responsibility to ensure

that all personal data submitted to the Company are correct. You are responsible for maintaining the accuracy and completeness of personal data and keeping the data uptodate.

## What Information We Collect

2.

2.1 During your utilization of our Service, there may arise instances wherein we solicit specific personally identifiable information ("Personal Data") from you. This Personal Data

may encompass:

Information
pertaining
to
user
identity:
CNIC
Number,
Name,
Date
of
Birth,
Gender,
Residential

Address, Reference Contact, Education Information, Work Information, Marital Status, Bank Account Information, Biometric Information, inclusive of Facial

Data; 2.1.2 Information employed to ascertain the user's eligibility for loan, such as credit history reports, income particulars, wealth declarations, asset and liability statements, details of various facilities the user has procured from other

requisite;

2.1.3
The following information that we may accumulate subsequent to obtaining explicit

consent from the user

financial
institutions,

and any other information

we consider

to permit access to the application: Location, Camera, Calendar, Phone model and status, Reference contacts, Application activity, and Collaborator.

a. Location: When engaging with our Apps, we may gather and scrutinize your geolocation data aid us in

financial
risk.
We
are
committed
to
abstaining
from
collecting
your
geolocation
data

when you are

the

evaluating

not utilizing the Application. You possess

prerogative to deactivate

geolocation feature

on your device at your

discretion.
Please
rest
assured

that we will never divulge your location data with any third party unless sanctioned by the exceptions delineated in this policy. b. Camera: When applying for а loan, you

b.
Camera:
When
applying
for
a
loan,
you
need
to
use
your
camera
to
scan
the
CNIC
certificate.
After
taking
the
photo,

the relevant information will be automatically filled in,

this
is
to
reduce
the

input errors and saving

you valuable time.

For the security of

loan account,

your

account,

living photo will be

verified to

compare whether the

current operation is yours. We will collect and ask you to upload CNIC photos and live photos. We assure you that the uploaded photos are only for user loan approval and will not access the gallery or photos on your device. Your consent will be sought again when applying for camera permission. С. Calendar:

We may be authorized to access the calendar on your mobile device to

loan repayment due dates. We

remind you of your

will never

share your location data with any third party, except as permitted by the exceptions set forth in this policy. d. Phone model and status: The information we collect from your device includes advertised IDs, unique IDs (i.e., IMEI numbers), operating system information, SDK versions, and mobile network information (including carrier name, SIM card slot, your profile information, and Wi-Fi network information). a) The collection of information by apps and the use of that information

depend on

how you manage the privacy controls on your device. When you install an application, we store the collected information along with unique identifier linked to the device you are using. When you download and install an application, we collect information from the device and explicitly seek your permission to obtain the necessary information from it. b) We

your device to provide automatic updates and enhanced security prevent unauthorized account access. Additionally, this information

gather information about

offers valuable insights into your identity as device owner and your device's behavior, enabling us to  $\verb"improve"$ our services and deliver а more customized user experience. Furthermore, Ad ID information is utilized for fraud prevention, security, and compliance purposes. For instance, we use this information to monitor failed login attempts, helping us identify potential fraudulent activities. е. Reference Contacts:

Borrowers are only required to enter the contact details of their reference contacts during the loan application

process. This allows us to verify the customer's and reference contact's identities via phone/text message, prevent fraud, and track collections. We upload this contact information to our servers in an encrypted format within secure environment.

network f. Application activity: We require access to the activity within application, including the package name, application name, first installation time, and application update times. This is to assess the customer's eligibility for loan. We will upload

this

information

our servers in an encrypted manner. This helps us identify and analyze behavior and risk across multiple loans to evaluate whether the loan can be processed, which aids in preventing fraud. g.

Collaborator: The

SDK we utilize to

connect

with Deeplink third-

party

services is

distributed

across

various

social networks,

including Google

and

Facebook.

discerns

Ιt

the attribution

source

of user

channels

and

communicates

the

identity of

each

channel.

Neither

Deeplink

nor

Paisayaar

accesses

or

uses any

information

from users' private accounts.

2.2 Data retention and

deletion The information provided by the uploaded CNIC and facial photos is only used for detecting

verifying the

and

authenticity of

your identity, as

well as

confirming whether

the facial photo

the current

on

the

operating

app matches

CNIC, ensuring

they belong

to the

same individual.

The above data shall

be stored for

1 year from the date

of acquisition.

If
the
customer
wants
to
delete
the

data, they can send request to customer service at the following email: support@paisayaar.pk and we can manually delete the data within 3-5 business days. 3. What we use the information for 3.1 Information collected by us (or where applicable and necessary, the parties stated at clause 3.3) shall be used for the purpose of determining whether or not to provide financial service or product to you, the amount of

such exposure and

the terms and conditions applicable to such services or product. 3.2 We access, store and use the

information we collect from you

to provide our services and develop new products.

We use personal information to provide the services you request in order to customize your user experience and

improve our services. If we intend to use your personal information to promote any products to you,

will provide you with the ability to optout of such uses.

we

3.3 We share your personal information with other partners, as described in this Privacy Policy, when services are provided by partners authorized by us. In addition, we may share personal information with our affiliates and subsidiaries. 3.4

We use your information to power our services and to improve your experiences and interaction with the Company.

3.5 We

use your information to provide, support, improve, protect, analyze and bill for our products and services; to communicate with you

about your service, products applications; to market our products and services; to detect and avoid fraud; for advertising; and for research purposes. We may use information collect from you when you purchase product or service from us, sign up for our newsletter, respond to а survey or marketing communication, surf the Website or Application, if you register for an online account with us, download and register on one of our apps or use certain other site

the following ways: personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested; b. improve our website/app in order to better serve you; С. allow us to better service you in responding to your customer service requests; administer contest, promotion, survey other site feature; e. ask for ratings and reviews

of services or products; and

features

f. follow up with them after correspondence (live chat, email, phone inquiries, or WhatsApp, either directly with the user or with and through an authorized person of reference whose information has been provided by the user to the Company 3.6 This means we may: a. record

record
details
about
the
products
and
services
you
use
or
order
from
us;

b. send you product or serviceinformation messages (we may send you messages to confirm your

order

and tell you about any changes that might affect your service, like when we have infrastructure work planned or need to fix something); С. let you create and log in to the online accounts we run; d. charge you and make sure your payment reaches us; and е. give information to someone else (if we need to for the product or service you've ordered) or to another communications provider if you're buying some services from

and us. 3.7 In addition, we use the following information provide products and services and manage your account: a. your

them

contact details and other information to confirm your identity and your communications with us. This includes your Personal Information and other relevant

b.yourpaymentandfinancialinformation;

credentials;

С. your communications with us, including emails, webchats and phone calls. We will also keep records of any settings

communication preferences

you

choose; and d. information from cookies placed on your connected devices that we need S0 we can provide service.

# 4. When we may disclose information to third

parties 4.1 We may disclose some or all of the data we collect from you when you download or use the Paisayaar Platform to connect to mobile wallet providers, credit bureaus, or other partner financial institutions. We

We may disclose your personal information to any member of

our group, which means subsidiaries, our ultimate holding company and its subsidiaries. 4.2 We may also use thirdparty payments services provider or payments processing company to process payments and repayments, transfer money to your Operative Account or any other user account, process other payments, and to provide additional products and services, and may therefore disclose your information to such thirdparty payments services provider. 4.3

We may disclose your personal information to any local

or international law enforcement officers or competent regulatory or governmental agencies, in good faith belief that such disclosure is reasonably necessary to enforce any terms and conditions and/or this Privacy Policy, to assist in the prevention, detection, investigation or prosecution of criminal activities or fraud. 4.4

We shall use your data for the purposes of compiling statistics relating to our user base or financial product or services and may

to
any
third
party
for
such

disclose such

information

purposes, provided that such information will always be anonymous.

4.5 We may use other thirdparty companies to monitor site traffic, which may, in some instances, store customer information. Where we use another organization, still

we
have
strict
controls
in
place
to
make
sure
it's

properly protected.

4.6

control your personal information

and

We
may
also
disclose
or
transfer
your
personal
information
to
third
parties
in
the
event

a. the Company is involved

that:

in merger, bankruptcy, acquisition, reorganization, liquidation, or sale of assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; b. the Company or substantially all of its assets are acquired by а third party, personal data held by it about its customers will be one of the transferred assets; С. the Company is under а duty to disclose or share your personal data in order

to
comply
with
any
legal
or
regulatory
obligation
or
request;
or

4.7
In
order
to

4.7
In
order
to
enforce
any
terms
and
other
agreements
or
to
investigate
potential
breaches;
report

defaulters to any credit bureau or for the purpose of publishing statistics relating to the use of

Paisayaar
Platform,
in
which
case
all
information
will
be
aggregated
and
made
anonymous.

4.8 We

may use your Personal Information, or any other information obtained as stated in this Privacy Policy to contact

```
you,
via
SMS.
```

### 5. Tracking and Cookies

5.1 "Cookies" are small text files transferred by а web server to users' hard drive and thereafter stored on their computer. The types of information а

include the date

cookie
collects

and time users visited, their

browsing history, preferences, and

username.

5.2 The Company may use Cookies

manage our users' sessions

to

and to store preferences, tracking information,

and language selection. Cookies

may be used whether customers register with us or not.

5.3 In some instances, our

thirdparty service

providers

may use

cookies

on the

Paisayaar Platform.

We cannot

control

or access

cookies used

by thirdparty service

providers.

This Privacy

Policy covers only

Cookies

used

by us, and

not any

Cookies

used

by third

parties.

5.4 Customers

may

have the

ability to

either

accept or

decline the use

of Cookies

on their computer,

whether registered

with

us or

not. Typically,

you can

configure

your browser to not accept Cookies. However, declining the use of Cookies may limit your access to certain features of Paisayaar Platform. Cookies help us to provide you with а good experience when you use the Paisayaar Platform or browse any of the websites and also allow us to improve the Paisayaar Platform and any other of our websites. 5.5 We will

not use Cookies for any purposes not stated in this Privacy Policy. You can clear all

the Cookies stored on your computer, and most web browsers provide the option of blocking Cookies. However, by doing so, you have to change the user settings every time you visit our

5.6 In addition to

Cookies,

website.

we may

also use other

similar technologies

technologies on the

Paisayaar Platform

such as web

beacons and

pixel tags.

For example,

when you

receive an

email from

us, it may

contain a

clickthrough URL

that

links to

our web

page.

Ιf you click the link, we will track your visit to help us learn about your preferences for products and services and improve our customer service. Α web beacon is a transparent graphic image embedded in а website or application or in an email. We use pixel tags in emails to find out whether an email has been opened. You can unsubscribe from the mailing list at any time if you do not want to be tracked in this

manner. Ву using the Website or Application and accepting this Privacy Policy, you consent to the use of Cookies, web beacons and pixel tags as described above.

We retain the above information to resolve necessary disputes, provide support to users, and resolve issues

## 6. Limitations

 $\operatorname{permitted}$ 

by law.

on the Use and

Disclosure of

your
Information
and
Exercise
Access,
Rectification,
Cancellation
and

Opposition ("ARCO") Rights

6.1 To

the extent required by applicable

laws, you have the right to access your personal information collected and the details of their treatment, well as to rectify them if they are inaccurate cancel their use through written request addressed to the following email address support@paisayaar.pk or by submitting а letter within the office facilities of the Company during office hours on working days, said requirements will be attended on priority basis. Please note that deleting or withdrawing information may affect the services

we provide to you. Ιf there is any change in personal information made by you, you must provide supporting documents related to the change of personal information for verification by the company. 6.2

To
exercise
ARCO
rights,
an
application
must
contain
and
accompany
the
following:

The

full name of the user, address and email account or any means to communicate the response to the request.

b.
The
documents
that
prove
the
identity
or,
where

appropriate, the legal representation of the user.

С.

The clear and precise description of the Personal Information on which you wish exercise any ARC0

Rights.

d. In the case of requesting rectification, documentation that supports the requested rectification must be attached.

е.

the Company reserves the right to request additional information and/or documentation to that mentioned in order to meet the request.

6.3
The
Company
will
not
be
obliged
to
delete

any personal information when (i) it is necessary for performing the contract obligations, (ii) it is subject the applicable laws, (iii) it is necessary to comply with an obligation legally acquired by the user. 6.4 You may also at any time oppose the processing of data that is not essential for the legal and/or commercial relationship that you establish with the Company, which you may do through the procedure indicated here. 6.5 In the processing of

your personal information, it is primarily anticipated that its protection is against any damage, loss, alteration, destruction, against any unauthorized use, access or

# 7. Security Practices and Safety Precautions

treatment.

7.1 We adopt reasonable security practices and procedures, to include, technical, operational, managerial and physical security controls in order to protect your personal information from unauthorized access, or disclosure while it is under our control. Your personal information

contained behind secured networks and is

only accessible by а limited number of persons who have special access rights to such systems and are required to keep the information confidential. 7.2

The data and information we collect from you may transferred to, and stored at, destination i.e., e. it is encrypted

and stored on the Paisayaar Platform

or Company server. The staff members at the destination may be engaged in the

your requests. By submitting your personal information, you agree

fulfillment

of

to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

7.3 Our security practices and procedures limit access to personal information on needonly basis. Further, our employees are bound by code of conduct and confidentiality policies

which obligate them to protect the

of personal information.

7.4
We
maintain
the
security
of
our
Paisayaar
Platform,
however,
for
reasons

confidentiality

outside of our control, security risks may still arise. Any personal information transmitted to us or from online products or services will therefore be your own risk. However, we will use all reasonable efforts to ensure the security of your information. We observe reasonable security measures to protect your personal information against hacking and virus dissemination. 7.5 Where we have

given you (or where you have chosen) а password that enables you to access certain parts

of

our Paisayaar Platform, you are responsible for keeping this password confidential. We ask you not to share password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, but we cannot guarantee the security of your data transmitted to our Paisayaar Platform; any transmission is at your own risk. 0nce we have received your information, we will use procedures and security features to

try prevent unauthorized access, to the extent reasonably practical. 7.6 You agree that the Company or any of its affiliates, associated or related entities, employees, directors, shareholders, agents, representatives etc. shall have no liability towards you in case of any unintended security breach which results in unauthorized access to, or disclosure of, your information. You agree to waive, to the fullest extent permitted by law, all of your rights seek damages or otherwise hold the Company

and its related entities liable for any security breach resulting in disclosure or unauthorized access to your information.

## 8. Privacy Control and Permissions

8.1 Regarding the information we collect and how it is collected, you have specific choices that may control what information we collect after using your device. For

example,
you
can
modify
the
permissions
on
your
Android

or iOS device to

access

camera or audio permissions or

delete
your
account
on
the
Paisayaar

Platform.

You can also delete content from our servers, subject to applicable laws, by requesting us via email support@paisayaar.pk. 8.2 0nce you have deleted your account, you will no longer be able to use the services via Paisayaar Platform. The Company reserves the right retain your personal information in accordance with relative applicable laws and regulations for а retention period required by the laws. Upon the expiration of the retention period, we will remove or anonymize your

personal information. 8.3 Your written request may be required for security. When you object to, or restrict our use of your personal data, this may affect the services we provide to you. We may decline the request if we have reasonable grounds to believe that the request is fraudulent, unfeasible or may jeopardize the privacy of others.

Link to other websites or applications

9.

The

Paisayaar App might share the links to other websites

promotion. Please be aware of these other websites, they may collect your personally identifiable information. We are not responsible for the privacy practices content of these linked websites.

apply
Paisayaar
App
application
on
Google
Play
to
ensure
safety
of
your
personally
identifiable

information.

10.

Only

Your
Consent
to
the
Collection,
Storage,
Use
and
Disclosure
of
Information

By
using
the
Paisayaar
Platform
and/or
by
providing
your
information,
you
agree
to

10.1

the

collection and use of the information you disclose or that generated as а result of your use of our service on the Paisayaar Platform accordance with this Privacy Policy, including but not limited to your consent the collection, use, sharing and disclosure in accordance with this Privacy Policy your message. If we decide to change our Privacy Policy, will post these changes on the Website or Application S0 that you can always know what information we

collect, how we use it, and under what circumstances we disclose it. 10.2 Ву providing us with your contact information, including home or mobile phone number, we obtain your permission to contact you or authorized person of contact whose details have been provided by you to the Company through SMS, manual or prerecorded voice messages and automatic dialing technology, WhatsApp, email, livechat, and post, for all purposes that are not prohibited by applicable laws. Message

and data rates may apply. The purpose of the call and information includes; suspected fraud or identity theft; obtaining information; transactions or services of your account; collecting your account or collecting accounts that are in arrears. The rights granted to us in this section are extended to our company's affiliates, subsidiaries, agents, suppliers, ultimate holding company or its subsidiaries. 10.3 Subject to applicable

Subject
to
applicable
laws,
you
have
the
right
to
withdraw
your
consent
for
such
collection,
store
and
process

of your information at any time by cancelling your account from your device, provided that you have obligation pending towards the Company. You can revoke the consent granted to the Company, in order to stop using them, for which the procedure indicated in section 6 of this Privacy Policy must be followed. You can withdraw your consent for further collection of this information at any time by logging out and uninstalling the Company mobile or other applications from

your device. 10.4 We process your personal data based on your consent. However, withdrawal does not affect the legitimacy and effectiveness of how we process your personal data based on your consent before the withdrawal is made; nor does it affect any data processing based on another justification other than your

## 11. Protection of Minors

consent.

We

place great value on the protection of minors' personal information. As required by applicable laws and

regulations,

any

under the age of 18 should be banned to use our service. As the parent or statutory guardian of а minor, it is your responsibility prohibit your child from using our service. Otherwise, all legal consequences are borne by yourself.

user

## 12. Disputes

With respect to any disputes regarding this Privacy Policy including but not limited to any provisions related to indemnification, limitation of liability relating to damages, choice of law

and dispute resolution forum,

```
we
ask
you
to
first
submit
any
such
complaints
directly
to
us
the
relevant
customer
services
desk
helpline.
13.
Contact
Us
Please
contact
us
if
you
need
help:
Company
name
JingleCred
Digital
Finance
Limited
Principal
Business:
Nano
Lendings
Status
of
company:
NBFC
(Investment
Finance
Service)
License
No.
SECP/LRD/78/JDFL/2022-
85
Date
of
License
issued:
March
10,
2023
Product
name:
Paisayaar
Contact
us
by
email:
support@paisayaar.pk
Contact
us
by
phone:
051-
111-
883-
883
```

Service Timing: 9:00-18:00 Address: Apartment #3, 2nd Floor, Jispal Plaza, Plot #5, Sector

G-8/4, Islamabad.