



# PRIVACY POLICY

JANUARY 2021

## 1. Introduction

1.1 Noriapay (hereafter known as 'we') are committed to safeguarding the privacy of our data-subjects ('you' or 'user'); in this policy we explain how your personal data, meaning any information relating to you as an identified or identifiable natural person, that we may hold about you, is collected, used, stored, disclosed, and removed (each and all referred to as 'processing').

1.2. We do not collect any personally identifiable information from children under the age of 18. If you believe that a child under the age 18 has provided us with personally identifiable information, please contact our customer support.

1.3. This Policy only applies to information we process. It does not apply to the practices of companies that we don't own or control, or employees that we don't manage. Information on our services; may contain links to third party websites, and any information you provide to those sites will be covered by any privacy policies they may have. Please be sure to read the privacy policies of any third-party sites you visit. It is those sites' responsibility to protect any information you give them, so we can't be held liable for their wrongful use of your personally identifying information.

1.4. We may update this policy from time to time and will notify you of changes to this policy affecting your rights by email and/or by posting on our website at [noriapay.com](https://noriapay.com)

## 2. Your Personal Data and How We Use It

2.1. In this Section 2 we set out the general categories of data and types of personal data that we may process the source of that personal data the purposes for which we may process personal data; and the legal bases of the processing.

2.2. We may process your registration data ('registration data'). Registration data may include your username and email address. The source of the registration data is you. Registration data is required in

order for you to be able to use the service. The legal bases for this processing are consent and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract;

2.3. We may process information that you provide to us for the purpose of subscribing to our email notifications, SMS notifications and/or newsletters ('notification data'). The notification data may include your email address, phone number, username and full name. The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent. You can unsubscribe at any point by contacting us or by clicking the unsubscribe link in the email.

2.4 We may process information contained in or relating to any communication that you send to us or what you generate through the use of our service ('communication data'). Communication data includes 1) all your messages, requests and other communication with our customer support which may happen during the dispute review process or via support tickets, emails, or by means of any other communication tool; and 2) all your communication and file attachments that you generate when conducting trades with other users ('trade chat messages') or other data that you generated mainly by communicating to other users. Communication data may include, email address, username, IP address, full name, audio and video files and in the case of manual ID verification: photo of the user's personal ID, photo of the user, and photo of the user's utility bill or related document. The communication data may be processed for the purposes of communicating with you, record-keeping, in order to review and resolve disputes, serve our customers better and improve our service. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.5 While for your transactions purpose we will keep a track of your Bank Details and information pertaining to your IP address and the device or computer used by you for the purpose.

Noriapay will further use your personal information to:

- a) To process transactions,
- b) To send periodic emails and SMS with updates, promotions, company news, and notices regarding changes to policies,
- c) Customize, measure, and improve Noriapay Service and the content and layout of our Website and applications,
- d) To analyze use of the Website,
- e) Prevent potentially prohibited or illegal activities, and
- f) To undertake a verification of your identity with third party electronic identification providers.

2.6 Noriapay will collect your personal information for opening an account and also for your transactions. Your personal details will include your:

- Passport Details
- Adhaar Card Details
- Driving License Details
- Contact Number
- Email ID

### **3. Disclosure of your Personal Information**

No personal information of any user is being disclosed for any purpose. Stored personal information is available only to the user for editing purposes and to customer service personnel, verification department and to administrators and consultants, and third-party entities and service providers who are bound by non-disclosure agreements.

### **4. Changing your Personal Information**

You may access your personal information in order to make changes or corrections by visiting Account Settings -> Settings. However when you change any personal information, you will need to provide the documents

again and go through verification procedure before your changes come into effect.

## **5. Cookies**

We may also place cookies on your device while you access the Website. In this regard, we use flask cookies to promote account security, as well as both session and persistent cookies. Any sensitive information in these cookies are encoded so that only Noriipay can interpret the information stored on them. The cookies are placed for the following purposes:

- a) Recognize you as a Noriipay customer,
- b) Collect information about your computer to mitigate risk and help prevent fraud,
- c) Customize your experience, content, and advertising.
- d) Measure promotional effectiveness.
- e) While Noriipay will attempt to notify you of these changes, it is your responsibility to review this privacy policy on a regular basis and remain informed and updated of any changes.

## **6. Contact Us**

If you have any questions on this Privacy Policy, please contact the team at [support@noriipay.com](mailto:support@noriipay.com)