

# **ELAS – Privacy Policy And Other Terms**

## **Who does this Privacy Policy apply to?**

This Privacy Policy applies to all customers or users ("User"/"You") who use or intend to use \_\_\_\_\_ ( "Easy Loan Against Shares service") on [elas.blink.loan](https://elas.blink.loan) ("Website") provided by JM Financial Products Limited ("JM Financial", "We", "Us", "Our"), a Non-Banking Financial Company incorporated under the Companies Act, 2013 and registered with the Reserve Bank of India, with its registered office at Cnergy, 7th, Appasaheb Marathe Marg, Prabhadevi, Mumbai, Maharashtra 400025.

## **Why this Privacy Policy?**

JM Financial acknowledge and accept that the personal details that you share with us, will be kept confidential and will use the information only in the manner which would be beneficial to our Users. Your privacy is important to JM Financial. We consider our relationship with you as invaluable and strive to respect and safeguard your right to privacy. We understand clearly that your Personal Information are one of our most important assets. We store and process your Personal Information including any sensitive financial information collected (as defined under the Information Technology Act, 2000), if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures in accordance with Information Technology Act 2000 and Rules made there under. If you object to your Information being transferred or used in this way, please do not provide the details of your information on our Website.

## **Disclaimers and warranties**

- While every effort has been made to ensure the accuracy of the material on Website, it comes with no explicit or implied guarantees. In particular, no guarantees are made in connection with such material about non-infringement, merchantability, security, accuracy, suitability for any purpose, or freedom from computer viruses.
- No information gained from the Website, whether orally or in writing, shall establish any warranty except specifically expressed below. JM Financial does not warrant that the Website will meet all of your requirements; that the Website will be available at any time or location, uninterrupted or secure; that there will be no delays, failures, errors, or losses of information; or that the Website will be free of viruses or other harmful components.
- You are solely responsible for ensuring proper data and/or equipment protection, as well as taking reasonable and suitable procedures to scan for computer viruses and other dangerous components.
- JM Financial makes no representations or warranties about any product or service promoted or sold by a third party through the Website . JM Financial will not be a party to or oversee any transaction between you and third-party product or service providers.
- You agree that all online transactions are vulnerable to disruptions, transmission outages, and delayed transmission events by their very nature. JM Financial is not responsible for failures in communications facilities outside of its control (including e-mails) that may impact the accuracy or timeliness of transactions you conduct or cause you to lose money in any way.

## **What Information do we collect?**

We may gather the following personal information from you in order to perform any transactions on the Website:

Information that you may be providing us:

- Identification Information: Your name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information;
- Your PAN, KYC Status, Signature and Photograph;
- Your Bank account or other payment instrument details;
- Any additional information you give us to help us perform services, such as essential paperwork for managing user accounts or placing transaction orders.

Information that may be gathered as a result of your usage of the Website includes:

- When you visit the Website, we gather information about your device, such as storage, hardware model, operating system and version, unique device identification, information on mobile networks, location, contacts, and information about the device's interaction with our services.
- We read SMS to retrieve OTP sent by JM Financial during login or transaction related authentication.
- Such information may be collected in a manner that the User is always aware of the collection and purported usage of the same. The User shall have an option to withdraw consent to share the information. However, such intimation shall be required in writing. Such intimation shall only be taken into account from the date on which the same is received. JM Financial may stop ELAS services in case such intimation is received in case the same is required under the regulations. Such information shall only be used for the purpose it is collected.

Log File Information that is automatically saved:

- When you browse or download information from the Website, certain information about your visit is automatically saved on our computers. This includes information on the browser you're using (e.g., Internet Explorer, Firefox), the operating system you're using (e.g., Windows or Mac OS), the domain name of your Internet Service Provider, the date and hour of your visit, and the pages you've visited on the Website. This information cannot and will not be used to identify you personally.

## **What is the purpose of collecting this data and how will it be used?**

We only collect, keep, and utilize information about you when we have a good faith belief that it will help us run our business or offer you with products, services, or other opportunities. In general, such data is gathered for the following purposes:

- To provide you any support you might need while using our services;
- To supply you with any additional services you might need;
- To fulfill your requests for financial and non-financial transactions;

- To conduct research and analysis in order to improve our services or to provide new goods or services;
- To handle any applications for financial services that may have been filed;
- To inform you of any updates or changes to our services, as well as their terms and conditions;
- To examine and respond to any complaints, claims, or disputes, as well as to offer you with the necessary help;
- To appropriately reply to any questions or feedback you may provide;
- For the purposes of confirming your identification and other details,
- To comply with all applicable laws and regulations, as well as any judicial orders that may apply to us.
- To enhance the serviceability of the Website, as well as the material available on it, in order to give you a better user experience.

Except where the information may lawfully be used or is otherwise required to ensure compliance with any laws or regulations, we do not maintain or store any of your personal information for any longer than is necessary for the aforementioned objectives.

#### **What security procedures do we employ to safeguard your data?**

- We appreciate the trust you have put in us by providing us with your personal information, and we will continue to apply necessary safeguards to secure it. However, there may be instances that mode of transmission, whether in physical form or over the internet, or technique of electronic storage, is completely secure and may be exposed to a variety of threats due to factors without our control.
- To protect the integrity and security of your personal information, we apply commercially reasonable physical, administrative, and technological precautions, as well as frequent checks on our security measures to prevent unauthorized access to systems where we hold personal data, are among these. To safeguard the security of your personal data, we have used suitable encryption techniques as well as physical security measures.
- All data collected on the Website is securely saved in a database managed by us. This database is kept on secure servers with password protection and stringent access controls.
- Our website sometimes has links to other website(s) in the World Wide Web. The privacy policies of these website(s) are not under our control. Once you leave our website/servers, use of any information you provide is governed by the privacy policy of the operator of the website you are visiting. It is advisable to read their privacy policies for further information. Your browsing and interaction on any other website, including those that have a link on our Website, is subject to that website's own rules and policies. It is advisable to read their privacy policies for further information
- We take reasonable procedures (such as 2 factor authentication) to authenticate your identity before providing you access to safeguard your privacy and security. Finally, you are responsible for keeping your login details secret. All activities conducted through your account are strictly your responsibility. We accept no responsibility for any inappropriate information management, which may result in the compromising of your personal information.

**Will your personal information be shared with anybody else?**

JM Financial shall not deliberately disclose User's personally identifiable information to any unauthorized third person., save and except where such information shall be disclosed in good faith and for the purpose of law for the time being in force or to protect the rights and property of JM Financial. However, JM Financial has a right or duty to disclose or is permitted or compelled to so disclose such information by law, for the time being in force. For example, JM Financial may share/provide information with/to judicial bodies and regulatory authorities who have jurisdiction over JM Financial.

**How can you keep your personal information up to date?**

You may review the personal information you supplied to us upon writing request. JM Financial will make every effort to rectify or update any personal information or sensitive personal information that is determined to be outdated or insufficient.

**What is our cookie policy?**

- Cookies are small bits of text transferred by your web browser to each platform you visit on the internet. A cookie file is kept in your browser and allows the platform or any third-parties linked with the platform to recognise you and make your next visit simpler. Cookies can be "permanent" or "session" cookies. Persistent cookies remain on your personal device when you go offline, but session cookies are removed as soon as you exit your browser.
- When you visit the Website, we acquire cookies from your browser. We utilize both session and permanent cookies when offering our services on the Website. Some cookies are essential- i.e- they are used to authenticate users and prevent fraudulent usage of user accounts.
- If you want to remove or refuse cookies, please visit the help pages of your web browser. Please note, however, that if you remove cookies or refuse to accept them, you might not be able to enjoy all of the features we provide, you may not be able to keep your preferences, and some of our pages might not appear properly.

**Miscellaneous**

- You agree and understand that when you use the Website or give us emails or other data, information, or communication, you are communicating with us electronically, and you consent to receive messages from us on a regular basis. We may send you notices through email, push notifications on any JM Financial platform, in writing as a hard copy notice, or by prominently posting such notice on the Website.
- This Privacy Policy and other terms is subject to change and may be modified or altered at JM Financial's sole discretion at any time without prior notice to the User. It is the User's obligation to examine the Privacy Policy and other terms on a regular basis to see if there have been any adjustments or updates. Any such adjustments will take effect as soon as they are posted on the Website.
- You acknowledge that in the event of a reorganization, merger, or restructuring of JM Financial, your personal information may need to be transferred to the new entity. You agree that any such process will result in the sending of your personal information to such businesses.

- Any disputes arising out of, in connection to, or under the provisions of this Privacy Policy/terms shall be resolved exclusively by the courts of Mumbai, India. Any issues may be addressed to an ombudsman or arbitration panels, depending on the nature of the disagreement and the appropriate regulatory structure.
- If you do not agree to the terms of this Privacy Policy/any other terms or any modifications made to it, please immediately cease using all of our goods and services and contact us at [elas.support@jmfl.com](mailto:elas.support@jmfl.com).

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