

## PRIVACY POLICY

### 1. Purpose and Scope

We, Capsave Finance Private Limited (“**Company**” or “**we**” or “**our**” or “**us**”), are committed to protecting the privacy of the information provider including the customers, vendors, employees and consultants of the Company (“**you**” / “**your**” / “**yourself**”). We consider privacy and protection of your data/ information to be of high importance. Our practices and procedures in relation to the collection and use of your data/ information have been set out below in this privacy policy (“**Privacy Policy**”).

For the purpose of this Privacy Policy, sensitive personal data or information of a person (“**Sensitive Personal Data or Information**”) is as defined under the Information Technology Act 2000 (“**IT Act**”) and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011 (“**SPDI Rules**”). Words and expressions used in this Privacy Policy but not defined herein but defined in the IT Act or SPDI Rules will have the meanings assigned to them thereunder. Please note that usage of the term Personal Information in this Privacy Policy includes Sensitive Personal Data or Information, wherever appropriate and/or mandated under the IT Act and the SPDI Rules.

The aim of this Privacy Policy is to ensure that you understand what personal information we collect about you, the reasons for collection and use, and entities we share it with. By providing your consent to this Privacy Policy, you agree to the collection, use and transfer of your personal information as set out in this Privacy Policy. In the event of a change in the law applicable to data protection in India, you expressly consent to the Company’s continued use, storage, collection and disclosure of your personal information and agree to provide such additional consents and approvals, in such form and manner, as may be requested by the Company. Should you choose to not provide the Company with such additional consents and approvals, the Company may be unable to provide you access to the website or provide the services.

By accessing or using our website or availing our services, or by otherwise giving us your information, you confirm that you have the capacity to enter into a legally binding contract as per applicable laws in your jurisdiction, and have read, understood, and agree with the privacy practices described in this Privacy Policy and the collection, storage and processing of your Personal Information in accordance with them. Please go through this Privacy Policy in detail and contact us if you have any questions or require any clarifications.

## **2. Collection of information**

- i. We collect the following Personal Information and Sensitive Personal Data or Information:
  - a. name;
  - b. address;
  - c. email address;
  - d. telephone number and mobile number;
  - e. financial information such as bank account details from customers, suppliers, and employees; and
- ii. You represent that the information or data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consents to provide such information or data. Your providing the personal data/ information to the Company is voluntary and you consent to the Company's storage, collection, usage, transfer (including to any entity that ensures at least the same level of data protection as is provided by us under the terms hereof, located in India or any other country, for access or processing of the same). You may choose to not provide us with personal data/ information or sensitive personal data or information, but in the event that you do so, we will be unable to provide you access to our website or provide our services.
- iii. You further represent that to the extent you provide us with personal information or sensitive personal data or information of any other person, you have obtained adequate consent from such person for sharing such information with us and our storage, processing and sharing of such information with any other person, under the terms hereof.
- iv. The Company tracks information provided by visitor's browser, including the website the visitor came from (known as the referring URL any type of browser used and other information that does not personally identify any visitor of the Company's website. This may include installation of cookies and collection of other sensitive data.

### **Use and Processing of your Personal Information (Including Sensitive Personal Data or Information)**

The information collected by the Company may be used for several purposes connected with our business operations which may include the following:

- i. dealing with requests, enquiries and complaints, customer services and related activities;
- ii. responding to your queries and fulfilling your requests for information regarding our products and services;

- iii. notifying you about our new products or services and sending you important information regarding our products or services;
- iv. legitimate business purposes;
- v. for employment purposes such as conducting background checks, recruitment, payrolling and recording attendance and business purposes;
- vi. for the purpose of onboarding and payment to vendors/ suppliers/ consultants; and
- vii. responding to judicial process and provide information to law enforcement agencies or as permitted by law.

### 3. **Disclosure and transfer of your Personal Information (Including Sensitive Personal Data or Information)**

- a. We do not sell or rent any Personal Information (including Sensitive Personal Data or Information).
- b. We may disclose/ transfer your Personal Information (including Sensitive Personal Data or Information) to our partners, associates, advisors, service providers, affiliates and third parties as necessary or appropriate:
  - i. for business purposes;
  - ii. To provide you our services;
  - iii. to comply with any legal process whether local or foreign;
  - iv. to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
  - v. to our advisors such as lawyers, chartered accountants and financial advisors in connection with business transactions; and
  - vi. to enforce our policies.  
(collectively, “**Purposes**”)
- c. The Company may also disclose or transfer your Personal Information and Sensitive Personal Data or Information to another third party as a part of a potential sale or reorganization of business or assets, in part or as a whole, other arrangements as well as exploratory exercises in relation thereto, reorganization or a sale of the assets or business of the Company to such third party. Any third party to which the Company transfers or sells its assets will have the right to continue to use such Personal Information and Sensitive Personal Data or Information.

### 4. **Third-party links**

- a. The Company’s website may include hyperlinks to various external websites, and may also include advertisements, and hyperlinks to applications, content or resources (“**Third**

**Party Links**”). We have no control over such Third Party Links present on the website, which are provided by persons or companies other than us. You acknowledge and agree that we are not responsible for any collection or disclosure of your information by any external sites, applications, companies or persons thereof. The presence of any Third Party Links on our website, cannot be construed as a recommendation, endorsement or solicitation for the same, or any other material on or available via such Third Party Links.

- b. You further acknowledge and agree that we are not liable for any loss or damage which may be incurred by you as a result of the collection and/or disclosure of your information via Third Party Links, as a result of any reliance placed by you on the completeness, accuracy or existence of any advertising, products services, or other materials on, or available via such Third Party Links. This will include all transactions, and information transmitted therein, between you and any such third party sites or applications or resources, such transactions are strictly bi-partite. We shall not be liable for any disputes arising from or in connection with such transactions between you and the aforementioned third parties.

5. Such third party websites, and external applications or resources, accessible via the Third Party Links may have their own privacy policies governing the collection, storage, retention and disclosure of your information that you may be subject to. We recommend that you exercise reasonable diligence, as you would in traditional offline channels and practice judgment and common sense before committing to any transaction or exchange of information, including but not limited to reviewing the third party website or application’s privacy policy.

6. **Retention of your Personal Information (Including Sensitive Personal Data or Information)**

We maintain records of your Personal Information and Sensitive Personal Data or Information only till such time it is required for the Purposes or for as long as required by law.

7. **Your rights in relation to your Sensitive Personal Data or Information collected by the Company**

- a. All Sensitive Personal Data or Information provided to the Company by you have been voluntarily provided to us. You have the right to withdraw your consent at any time in writing, in accordance with the terms of this Privacy Policy. However, please note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively. In case you do not provide your information or consent for usage of Sensitive Personal Data or Information or subsequently withdraw your consent for usage of the Sensitive Personal Data or Information so collected, the Company reserves the right to discontinue the services for which the said information was sought.

- b. You may write to us to access, review, amend or correct your Sensitive Personal Data or Information or withdraw your consent to provide Sensitive Personal Data or Information. However, we are not responsible for the authenticity of the Sensitive Personal Data or Information provided by you.
- c. You agree and acknowledge that in respect of any data or information which cannot be corrected or amended pursuant to any applicable law, law enforcement requests or judicial proceedings or the like, the aforementioned rights will not be available.

## 8. Security Practices and Procedures

- a. We use reasonable security measures at the minimum those mandated under the IT Act and the SPDI Rules, to safeguard and protect your Sensitive Personal Data or Information.
- b. Please be aware that the transmission of information *via* the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted through this website. Once we have received your information, we will use strict physical, electronic, and procedural safeguards to try to prevent unauthorised access. We request that you cooperate with us in protecting your Personal Information and comply with the following personal security measures:
  - (i) do not give third parties access to your computer or other devices when you access the website;
  - (ii) update your antivirus software when requested by your antivirus software provider; and
  - (iii) do not send any confidential information by using the website and/or through our services.
- c. You agree that the security measures adopted by us are reasonable to protect your Personal Information.

Notwithstanding anything contained in this Privacy Policy or elsewhere, we shall not be held responsible for any loss, damage or misuse of your data/ information, if such loss, damage or misuse is attributable to a Force Majeure Event. A "Force Majeure Event" shall mean any event that is beyond our reasonable control and shall include, without

limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.

## 9. Grievance Redressal

Any discrepancies and grievances with respect to processing Sensitive Personal Data or Information shall be informed to the designated Grievance Officer as mentioned on our website.

## 10. Changes to this Privacy Policy

The Company reserves the right to revise and update this Privacy Policy at its sole discretion. Any such revisions will be effective on and from the date of posting the same on the Company's website and will apply to all information collected both prior to and following the effective date. You are requested to review the Privacy Policy from time to time to keep yourself updated with any changes or modifications made to the terms hereof. Any continued use of the website or availing of our services, following any such amendments to the Privacy Policy, will be deemed as an implicit acceptance of the Privacy Policy in its amended form.

## 11. Children's privacy

- a. Our website and our services can be used only by any person who can form a legally binding contract under the Indian Contract Act, 1872. Our website and our services are not targeted towards or meant for users under 18 (eighteen) years of age. If you are under 18 (eighteen) years of age, then please do not use or access the service(s) at any time or in any manner. If you are a parent or guardian and discover that your child under 18 (eighteen) years of age has visited the website or otherwise accessed the service, then you may alert us at [grievance.cell@capsavefinance.com](mailto:grievance.cell@capsavefinance.com) and request that we delete that child's Personal Information from our systems.
- b. We do not knowingly collect Personal Information from users who are less than 18 (eighteen) years of age. Upon discovery of any Personal Information of any child, we shall purge such Personal Information in accordance with applicable law.

## 12. Review

Review of this policy shall be done once a year.