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**Effective from: 16-01-2025**

THIS PRIVACY POLICY (**Privacy Policy**) IS AN ELECTRONIC RECORD IN THE FORM OF AN ELECTRONIC CONTRACT FORMED UNDER THE INFORMATION TECHNOLOGY ACT, 2000 AND THE RULES MADE THEREUNDER AND THE AMENDED PROVISIONS PERTAINING TO ELECTRONIC DOCUMENTS / RECORDS IN VARIOUS STATUTES AS AMENDED BY THE INFORMATION TECHNOLOGY ACT, 2000 AND OTHER APPLICABLE LAWS. THIS PRIVACY POLICY DOES NOT REQUIRE ANY PHYSICAL, ELECTRONIC OR DIGITAL SIGNATURE.

THIS PRIVACY POLICY IS PUBLISHED AND SHALL BE CONSTRUED IN ACCORDANCE WITH THE PROVISIONS OF THE INFORMATION TECHNOLOGY (REASONABLE SECURITY PRACTICES AND PROCEDURES AND SENSITIVE PERSONAL DATA OF INFORMATION) RULES, 2011, INFORMATION TECHNOLOGY (INTERMEDIARY GUIDELINES AND DIGITAL MEDIA ETHICS CODE) RULES, 2021, GUIDELINES ON DIGITAL LENDING ISSUED BY THE RESERVE BANK OF INDIA (RBI), 2022, DIGITAL PERSONAL DATA PROTECTION ACT, 2023, AND OTHER RULES AND REGULATIONS MADE THEREAFTER; THAT REQUIRES PUBLISHING OF THE PRIVACY POLICY FOR COLLECTION, USE, STORAGE AND TRANSFER OF SENSITIVE PERSONAL DATA OR INFORMATION.

This Privacy Policy is a legally binding agreement between you together with the company or other business entity you are representing, if any, (herein referred to as **you** or **your**) and **ESTORIFY Solutions Private Ltd.**, a company incorporated under the laws of India and having registered office address at Second Floor, Global One, 252, Lal Bahadur Shastri Marg, Kurla West, Kurla, Mumbai, Maharashtra 400070 along with our affiliates and successors (herein referred to as **we, us** or **our**).

Thank you for using our products, services, applications, platform or websites! We value the trust you place in us.

We are committed to protecting your privacy. This Privacy Policy explains how we collect, use and share your personal information and other information provided by you. This Privacy Policy applies to your use of our products, services, applications, platform or websites, as further described in our T&C.

This Privacy Policy should be read in conjunction with the T&C. This Privacy Policy applies only to information we collect, process and use through our products, services, applications, platform or websites. This Privacy Policy does not apply to information that we collect through other channels/third parties such as information that we collect offline or from other websites/platforms/service providers.

By accessing or using our products, services, applications, platform or websites, you agree to be bound by and are deemed to have read, understood and agreed to the terms and conditions of this Privacy Policy. You hereby expressly consent to the processing of your personal information and non-personal information in accordance with this Privacy Policy. Your information may be stored, processed or transmitted in any location permitted by applicable laws. You always have the option to not provide or withdraw information by choosing appropriate options/choices available in the relevant section of our products, services, applications, platform or websites; however, please note that by virtue of you not providing a particular information or withdrawing any information, you may not be able to access or use our products, services, applications, platform or websites in fully and we shall be entitled to discontinue your use of a particular service or feature on our products and services.

By mere use of or access to our products, services, applications, platform or websites, you expressly consent to our use and disclosure of your personal and other information in accordance with this Privacy Policy; however, without prejudice to above, you will be required to confirm and provide your consent that you agree to the terms of this Privacy Policy and have no objection to the use of the information and data provided by you. This Privacy Policy is incorporated into and is subject to the T&C by reference. **[Comment: Please note that consent is required to be obtained in writing through letter/fax/email from the provider of sensitive personal information. We suggest that you take necessary steps to obtain such written consent before the users are asked to furnish personal information about themselves. We recommend that a button/option be provided to click I AGREE and I DISAGREE which has to be clicked prior to the access to the products and services and a corresponding auto-email is sent from the users email id to the platform.]**

Please note that our products, services, applications, platform or websites are offered in and are being operated from India and we comply with all legal and regulatory requirements in respect of user privacy and privacy of personal information. In the event you are located in any place other than in India, you shall not be eligible to avail our products, services, applications, platform or websites.

**If you do not agree to the terms of this Privacy Policy, then please do not use or access our products, services, applications, platform or websites.**

## I. TYPES OF INFORMATION WE COLLECT

We collect personal, sensitive and other information from you in a variety of ways when you use our products, services, applications, platform or websites, such as:

- Account and Personal Data:** We collect information like your name, your company's name (if applicable), birth date, nationality, email address, phone number, postal address, profile details, photographs, occupation, income level, interests, gender, identity proofs, government issued IDs, social security numbers (such as AADHAAR and insurance), tax identification numbers (such as GST, PAN, TAN), financial account numbers, bank statements, sales and purchase data, cashflow statement, balance sheet, income tax return filing data, credit information, credit score, KYC details, and other personally identifiable information.
- Background and History:** We collect personal, business and financial records and history from you or from third party authorised by you or from publicly available sources. We may also have arrangements with other services providers such as credit information company, verification companies, information repositories, data analytics providers, etc. who may already have your personal, business and financial information. You hereby authorize each of such services providers to share your information with us. Please note that we shall use such information only for the purposes specified in this Privacy Policy.
- Use Related Information:** When you use our products, services, applications, platform or websites, we store, process, transmit and share your data/information like documents, files, scans, records, returns, reports, images, videos, emails, feedback, postings, comments, log data, metadata and other data. If you give us access to your contacts, we'll store those contacts on our servers for you to use. This will make it easy for you to do things like share your data, send emails, and invite others to use our products and/or services.
- Surveys:** We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information, geographic information and demographic information, business information, etc. We use this data to tailor your experience when you use or access our products, services, applications, platform or websites, providing you with content that we think you might be interested in and to display content according to your preferences.
- Usage:** We collect information about your profile, behaviour, choices and preferences as per the data input by you. Your devices (depending on their settings) may also transmit location, IP address, ISP, type of device and other information to us. Our products, services, applications, platform or websites also provide information to us about its status, such as uptime, bugs, and errors that may have occurred.
- Cookies and other technologies:** We use technologies like cookies and pixel tags to provide, improve, protect and promote our products, services, applications, platform or websites. For example, cookies help us with things like remembering your username for your next visit, understanding how you are interacting with our products, services, applications, platform or websites, and improving them based on that information. We may use software tools to collect information about how you interact with our products, services, applications, platform or websites, such as mouse clicks, drags, hover-overs, response times, errors, length of visits to certain pages, server details and IP addresses. You can set your browser to not accept cookies or change the cookie settings, but this may limit your ability to use and access our products, services, applications, platform or websites. We may ask our other advertisers and partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or a third party. We do not control use of such technologies used by advertisers and partners and we expressly disclaim responsibility for information collected by them.
- Web Beacons:** A web beacon is a picture file used to keep track of your navigation through a single website or a series of websites. We may use such web beacons to study and analyse the usage of our products, services, applications, platform or websites.
- Analytics Services:** We may use third party analytics services such as [Google Analytics, Leadfeeder, Smartlook, Woopra, etc.] to collect information about how you use and interact with our products, services, applications, platform or websites. Such third party analytics services may use cookies to gather information such as the pages you visited, your IP address, a date/time stamp of your visit, etc. We use these analytics services to help us analyse how people use our products, services, applications, platform or websites, to improve them, to customize the content/features users see/use based upon their interests and to send email/reminders/follow-ups to users who are not actively using our products or services. For more information about how these entities use this information, please refer to their privacy policies made available on their websites.
- Information Collected from Third Parties:** We may receive information about you from third parties that offer their products and/or services on our products, services, applications, platform or websites. These third parties may supply us with your information. We may add this information to the information we have already collected from you via our products, services, applications, platform or websites in order to improve or make available our products, services, applications, platform or websites efficiently.
- Information from Other Sources:** Many of our features rely on information about you that we collect from partners and third party service providers, such as information pertaining to you in relation to the goods and service taxes, income tax reports, credit information, corporate information, etc. from the records maintained by the Ministry of Corporate Affairs, Income Tax Department and other governmental authorities or our partners/third parties.
- Other Information:** We may also collect other sensitive personal data or information as included in Rule 3 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011. **Please note that information about you shall not be considered to be sensitive or personal or private, if it is freely available in the public domain or under right to information laws or under any other applicable law for the time being in force.**

## II. HOW WE USE YOUR INFORMATION

- For Main Purpose:** We may use your information to arrange for providing you our products, services, applications, platform or websites. We may share your information with other Users or third parties if required as part of our products, services, applications, platform or websites or if requested/authorised by you.
- For Contacting You:** We may use the contact details provided by you to send offer details and reminders thereto or to respond to your email inquiries. Please note that if any information provided by you is wrong or incorrect or incomplete then in that case we will not be responsible for the information loss or privacy loss due to the message/details going to an another destination.
- For Other Offerings:** We may use and share information to inform you about different types of products, services and alternatives available to you or our other products and services and improvements/enhancements thereto.
- For Research:** We may use and share your information for research purposes on anonymous basis without expressly identifying you in any way, including market research, analysis, testing, monitoring, risk management and administrative purposes.
- For Operations:** In general, the information you submit to us or obtained by us is used either to respond to requests that you make, or to aid us in serving you better. We may also use your information in any of the following ways:
  - to send you a welcome e-mail and to verify ownership of the e-mail address provided when your user account was created;
  - to identify you as a user in our system;
  - to provide access to our products, services, applications, platform or websites;
  - to facilitate the creation of and secure your user account;
  - to provide improved administration of our products, services, applications, platform or websites;
  - to notify you about updates to our products, services, applications, platform or websites;
  - to customize our products, services, applications, platform or websites to meet individual requirements;
  - to improve and customize the quality of experience when you interact with our products, services, applications, platform or websites;
  - to track your interactions, submissions, status or other activities;
  - to create our independent derivative outputs from your information;
  - to third party contractors/service providers that provide services on our products, services, applications, platform or websites;
  - in case you are a service provider, to list or add new products or services offered by you
  - to permit third parties who may need to contact users who have bought/enquired above such third party's products/services;
  - to send you administrative e-mail notifications, such as security or support and maintenance advices;
  - to send you newsletters and other communications;
  - to engage with or contact inactive users of our products, services, applications, platform or websites;
  - to direct certain content, offers and advertisements to you so that you are more likely to see content, offers and advertisements that are relevant to you;
  - to analyze the data submitted by you;
  - to use on automated processes (e.g., for credit risk profiling or decision-making);
  - to complete payment transactions initiated by or as instructed by you;
  - to resolve service problems via telephone or email, troubleshoot technical problems etc.; and
  - to analyze the performance of our personnel and the quality of services performed.

- General:** We may also use and share aggregated or de-identified information for any purpose and in any manner. This anonymous data we share may include non-personally identifiable data that we create using your personal information by excluding information that makes the data personally identifiable.

## III. HOW WE SHARE YOUR INFORMATION

We may share information as per terms of this Privacy Policy, however we shall endeavour that such use of information does not create hindrance on your use of our products, services, applications, platform or websites. We do not share your personal information with third parties other than as follows:

- Internally:** We may share your information with our agents, contractors or third party service providers who provide administrative, telecommunications, computer, financial intermediary, payment or security clearing or other services to us in connection with our products, services, applications, platform or websites or the operation of our business.
- Others working for us:** We use certain trusted third parties to help us provide, improve, protect, and promote our products, services, applications, platform or websites (such as third-party analytics tools to help us measure traffic and usage trends for our products, services, applications, platform or websites, and specialists or professional agencies to provide you necessary products and services). These third parties will access your information only to perform tasks on our behalf and in compliance with this Privacy Policy. We may also share statistical data and other details (other than your personal information) to facilitates various programmes or initiatives launched by us, our affiliates, agents, third party service providers, or partners, from time to time.
- Third Parties:** We may also share certain information such as cookie data with third-party advertising partners. This information would allow third-party ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you.
- Your representatives:** Unless you specify otherwise, we may share your information with your employers, employees, associates, representatives, agents, etc. who helps with your access to and use of our products, services, applications, platform or websites.
- Other Users:** We may share your information to a third party (for example: a lender, sourcing partner, corporate, anchor, credit bureaux, etc. who is offering you or from whom you are availing services based on your selection) when you choose to avail certain services/ facilities offered on our products, services, applications, platform or websites. In such an event, we do not take any responsibility for any misuse or unwarranted disclosure of such information that may be made by such third party.
- Government and other authorities:** Please note that we may share your information with authorities to prevent a serious threat or fraud. We may also share information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, with government agencies mandated under the law to obtain such information.
- Generally with your consent:** There may also be other limited contexts in which we share specific types of information with your express/explicit consent. Any information or content that you voluntarily disclose for posting to our products, services, applications, platform or websites and becomes available to the public, as controlled by any applicable privacy settings that you set. To change your privacy settings / preferences on our products, services, applications, platform or websites, you may change your profile settings. Once you have shared the content/data with any person or made it public, that content/data may be re-shared by others.
- Structural Changes:** We may share some or all of your information in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, your information may also be transferred as a business asset. If another entity acquires us or our business or assets, that entity will possess all your information collected by us and will assume the rights and obligations regarding your information as described in this Privacy Policy.
- Enforcing Rights:** We may also disclose personal information to enforce our policies, respond to claims that a post or other content violates others' rights, or protects anyone's rights, property or safety.
- Law & Order:** We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to: (a) comply with the laws; (b) protect any person from death or serious bodily injury; (c) prevent fraud or criminal activities; and/or (d) prevent abuse of our name, brands, trademarks or such other rights belonging to us or our other users.

Stewardship of your data is critical to us and we acknowledge the same. We believe that our users' data should reflect the same legal protections regardless of whether it's stored on our servers or their home computer's hard drive. We'll endeavor to abide by the following principles when receiving, scrutinizing and responding to government requests for our users' data:

- Be transparent, and
- Make reasonable efforts to resist blanket requests,

Further, we will endeavour that the third party receiving your personal information does not disclose it further and that it observes similar level of data protection as is followed by us in respect of our products, services, applications, platform or websites and in consonance with this Privacy Policy and applicable laws.

## IV. STORING OF INFORMATION AND SECURITY

- Security:** We implement a variety of administrative, managerial, and technical security measures to help protect your information. We have implemented the ISO/IEC 27001:2013 standards. We have systems in place to keep your information secure and test for vulnerabilities. We also continue to work on features to keep your information safe in addition to things like alerts when new devices and apps are linked to your account. However, due to the inherent open nature of the internet and wireless communications, we cannot guarantee that your personal information or other information will be completely free from unauthorized access by third parties, when transferred over or through systems.
- Retention:** We will retain your information for as long as we need it to provide you the services or to retain back-up/archives, or as required by law.
- No warranty:** We use commercially reasonable safeguards to help keep the information collected through our products, services, applications, platform or websites secure and take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account, however, we cannot ensure or guarantee the security of any information you transmit to us or guarantee that information on our products, services, applications, platform or websites may not be accessed, disclosed, altered, or destroyed by any person in an unauthorised manner.
- Servers and Devices:** To provide you with our products, services, applications, platform or websites, your information may be stored on cloud servers and/or locally on the devices you use to access our products, services, applications, platform or websites.

## V. GENERAL TERMS IN RESPECT OF INFORMATION

- As per our T&C, our products, services, applications, platform or websites shall not be used by persons who are incompetent to contract as determined under the applicable laws. If we become aware that our products, services, applications, platform or websites are used by such a person, we may delete such information from our files/records and deactivate the related account. Further, in any event, we shall not be held responsible for any such information and/or its non-availability.
- You may update, correct, or delete your information and preferences at any time by accessing the preferences settings on our products, services, applications, platform or websites. If any personal information or sensitive personal data or information provided by you is found to be inaccurate or deficient, then the same shall be immediately corrected or amended by you. To attain this end, you will be granted reasonable access to such information or you may request us to update your information by emailing the request/clarification at [support@psbexchange.com](mailto:support@psbexchange.com). We may however before processing such requests, ask you to identify yourself and the information/data requested to be modified by you in order to avoid repetitive and/or illegitimate requests. We shall not be responsible for any delay in updating such information. Please note that we will not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by you.
- We may withhold or may not be able to provide information to you for valid reasons including if it:
  - contains references to another user(s);
  - is subject to legal/contractual privilege or cannot be disclosed for other legal reasons;
  - contains our or other users confidential commercial/business information;
  - is not maintained by us;
  - was created in the course of a dispute resolution process;
  - could threaten the life or security of another individual/entity;
  - was disclosed under a court order or was disclosed to a government institution as part of an investigation.
- Our products, services, applications, platform or websites may contain messenger, bulletin boards, chat rooms, or other message or communication facilities for interacting with other Users (each a **Forum**). Any information you reveal in a Forum is not subject to this Privacy Policy. It is therefore important that you carefully consider what information you disclose in such a Forum. Any information that may be revealed in such a Forum shall not be considered to be sensitive personal information.
- You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and us, at all times.
- Our products, services, applications, platform or websites may contain links to other websites over which we have no control. We are not responsible for the privacy policies or practices of other websites to which you choose to link from our products, services, applications, platform or websites. We encourage you to review the privacy policies of those other websites so you can understand how they collect, use and share your information. We are not responsible for any third party functionality, privacy or security policies which you are bound by.
- In the event you believe that your information has been stolen or compromised, you must contact us immediately at [support@psbexchange.com](mailto:support@psbexchange.com). We will endeavour to identify your account or provide restricted access upon being informed of such an event in order to protect your identity and information. However, we shall not be responsible for any unauthorized use/access to your account or disclosure of any personal information by virtue of such an event.
- The uploading, dealing, handling and/or using of any information for any lawful purpose by us, including for the purposes and in the manner outlined above shall not constitute publication in any manner.

## VI. CHANGES TO THE PRIVACY POLICY

We may change, modify, add/or delete portions from this Privacy Policy from time to time. If we make any changes to this Privacy Policy, the last modified Privacy Policy shall be applicable to you.

You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of such changes, modifications and/or deletions, if any.

## VII. COMMUNICATIONS

We may periodically send you free newsletters and promotional communications. When you receive newsletters or promotional communications from us, you may opt-out of these emails by following the unsubscribe instructions provided in the email you receive or by contacting us at [support@psbexchange.com](mailto:support@psbexchange.com). Despite your indicated email preferences, we may send you notices of any updates to our Privacy Policy, T&C or other transaction and administrative emails.

## VIII. DATA CONTROL

You have the right to access, correction, portability, and erasure of personal data as per applicable laws.

If you wish to access or amend any information that you have shared with us, you may contact us at [support@psbexchange.com](mailto:support@psbexchange.com).

If you wish to withdraw consent that you have given under this Privacy Policy, you may contact us at [support@psbexchange.com](mailto:support@psbexchange.com).

Please note that if you have availed any of products/services on or through our products, services, applications, platform or websites, we shall have the right to continue possession and processing your information.

Please note that while any changes you make will be reflected in active user databases within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

## IX. CONTACT

We welcome your comments or questions regarding this Privacy Policy. Please e-mail us at [support@psbexchange.com](mailto:support@psbexchange.com) with a subject line – **Attn: Privacy Policy**.

Our other contact details are provided on our website.