

DAVINTA PRIVACY POLICY

1. OVERVIEW

This Privacy Policy is an integral part of the Davinta terms of use ("**Agreement**") and is incorporated therein by reference for access and use of this website. Capitalised terms not defined in this Privacy Policy shall have the meaning ascribed to them in the Agreement. This Privacy Policy shall be read in conjunction with the Agreement.

Davinta Financial Services Private Limited provides this privacy policy in connection with an individual's use of any of Davinta's financial products or services or its website. ("**Davinta's Privacy Policy**").

For the purposes of Davinta's Privacy Policy, the term "**you**" or "**your**" relates to the individual (i) who applies for, or obtains, any of Davinta's financial products or services (ii) who visits the website. The term "**Davinta,**" "**we,**" or "**our**" refers to Davinta Financial Services Private Limited, its affiliates and subsidiaries.

Davinta's Privacy Policy applies to personally identifiable information about you, which we refer to as "**your information**". In connection with Davinta's treatment of your information, Davinta's Privacy Policy describes the policies and procedures (including a summary of the relevant security controls) that Davinta uses when collecting, maintaining, using, or transmitting (or "**disclosing**") to others any of your information. Please carefully read Davinta's Privacy Policy.

You should be aware that this Davinta website is not intended for, or designed to attract, individuals under the age of 18. We do not collect personally identifiable information from any person we actually know is an individual under the age of 18.

2. INFORMATION WE COLLECT

2.1 Information you provide: We collect various categories of your information (including Personal and Sensitive Personal Data) that you provide, either directly or indirectly, to us, such as:

- 2.1.1 Identifying information, such as your mobile telephone number, email address, residential address, nationality, photo, employee ID number, tax identification number, Aadhaar number, personal identification proof (Driving License and/or passport), PAN number, banking accounts related financial information, as may be necessary and applicable subject to the nature of the transaction and where permitted for diversity and monitoring purposes, we may collect information concerning your gender;
- 2.1.2 Financial information, such as information you provide on an application to us or from data we collect from transactions you conduct using Davinta's services; and
- 2.1.3 Information about your status or personal characteristics, such as whether you are employed, where you could work, and the number of days you work in a month.

When you connect one or more of your accounts with other financial institutions to your Davinta Account, we also may collect information to identify you, or to help verify that you are the true owner of the account(s), before connecting your account(s).

- 2.2** Information received from your devices: When you use your device to connect to Davinta’s Services, we receive information about that device, including IP address, hardware model, operating system, and other technical information about the device. We also use cookies or similar tracking technologies to collect usage statistics and to help us provide and improve our services.
- 2.3** Information collected from your financial institutions: Whether Davinta collects or maintains your information collected from the financial institutions you use, such as your bank, may depend on how you use Davinta’s Services. Generally speaking, when you link your primary bank account to Davinta’s Services, we may collect several categories of your information, including:
- 2.3.1 Account information, including your financial institution’s name, the account type you use (such as a “checking account” or “savings account”), account number(s), and the institution’s routing number;
 - 2.3.2 Information about any balance or transactions in your account; and
 - 2.3.3 Information about the account owner(s), including name, email address, phone number, and mailing address information.
- 2.4** Information we receive about you from other sources: We also collect your information directly from other persons, including our service providers. For example, Davinta may collect and maintain your information from service providers that help Davinta to identify you and to verify that you are the individual who is authorized to use Davinta’s Services.

3. WHY WE COLLECT, USE AND STORE THE PERSONAL DATA

3.1 Collection of Personal Data for propagating business.

From time to time, we may request aforementioned Personal Data from you to process your applications, and to get valuable feedback from your experience. In addition, we may also use your Personal Data for other business purposes or in order to help serve you better, such as informing you of new services, or alliances that could help you in your career or business. We will take reasonable steps to ensure that your Personal Data is accurate and complete.

3.2 Disclosure to third parties

We may disclose Personal Data to third parties. This disclosure may be required for us to check your eligibility for, provide you access to, and enable fulfillment of any services being provided to you, or to comply with any legal obligations, to enforce user agreements, to facilitate any marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to any services being provided to you. You expressly consent and agree to such disclosures to third parties.

We may disclose your personal information to third parties, such as business partners, service providers. This disclosure may be required for us to provide you access to our products and services; for enhancing your experience; for providing feedback on products; to collect payments from you; to comply with our legal obligations; to conduct market research or surveys; to enforce our Terms of Use; to facilitate our marketing and advertising activities; to analyse data; for customer service assistance; to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our product and services. We do not disclose your personal information to third parties for their marketing and advertising purposes without

your explicit consent.

We may disclose personal information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process. We may disclose personal information to law enforcement agencies, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to: enforce our Terms of Use or Privacy Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public.

We and our affiliates will share / sell some or all of your personal information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business. Should such a transaction occur that other business entity (or the new combined entity) will be required to follow this Privacy Policy with respect to your personal information.

3.3 Collecting Personal Data for online surveys

At times, we conduct online surveys to better understand the needs and profile of our visitors. When we conduct a survey, we will inform you about how we will use the Personal Data prior to your taking the survey. If you do not want to participate in the survey, you may refrain from contributing to it at your own discretion.

3.4 Use of cookies

The Company tracks information provided by visitor's browser, including the website the visitor came from (known as the referring URL), the type of browser used and other information that does not personally identify any visitor of the Davinta's website. This may include installation of cookies and collection of other session data.

3.5 IP address

The Davinta website uses Internet Protocol (IP) Addresses. An IP Address is a number assigned to your computer by your Internet service provider so you can access the Internet. Generally, an IP address changes each time you connect to the Internet (it is a "dynamic" address). We use your IP address to report aggregate information on use and to help improve our services.

4. HOW WE USE YOUR INFORMATION

We use the information we collect to operate, improve, and protect the services we provide, and to develop new services. For example, we use your information:

- (a) To provide Davinta's Services;
- (b) To improve, modify, add to, or further develop Davinta's services;
- (c) To protect you, Davinta's service providers, or Davinta from fraud, malicious activity, or other privacy and security-related concerns
- (d) To provide customer service to you
- (e) To investigate any misuse of Davinta's Services; and

- (f) To develop new services.

5. OUR STEPS TO PROTECT YOUR INFORMATION

We take steps designed to protect your information that we collect, maintain, or disclose. These steps include maintaining information security controls, such as encryption technologies when transferring data or even when storing data, firewalls, and controls over the physical access to our systems. We regularly evaluate the security controls that we use, as well as the controls that our service providers use, for protecting the security and confidentiality of your information. Our goal is to maintain effective security controls, as measured by relevant industry standards or by independent security auditors, for all of the ways that you can use Davinta's Services.

Davinta may keep your information for as long as necessary to fulfill the purpose for the information is collected. In addition, for some types of your information, Davinta may apply a longer retention period, such as for research or statistical analyses, except when storing or using that information for longer periods of time is not permitted under applicable law. As permitted under applicable law, even after you stop using the Davinta's services or terminate your account with Davinta, we may retain your information.

6. OUR RIGHTS TO DISCLOSE YOUR INFORMATION

Davinta makes various types of disclosures of your information to other persons as permitted by law. Our disclosures of your information may apply to some or all of the categories of your information that we collect. For example, Davinta may disclose all of the types of your information with your financial institution, consistent with your consent or instruction. Davinta also discloses, or reserves the right to disclose, your information:

- (a) With Davinta's service providers or contractors in connection with the services they perform for Davinta;
- (b) To the extent permitted by law, it will be necessary for us to verify the details you have supplied. Such verification could be done through third party service providers, who shall be bound by the obligation of confidentiality and data protection.
- (c) If Davinta believes in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process (such as a court order or subpoena);
- (d) In connection with a change in ownership or control of all or a part of Davinta's business (such as a merger, acquisition, or bankruptcy);
- (e) Between and among Davinta and Davinta's future affiliates (such as subsidiaries or other companies under common control or ownership); or
- (f) With your consent (by any reasonable method, including when you orally give your consent), unless you timely revoke your consent.

We may collect, use, process, or disclose your information in an aggregated or anonymized manner (i.e., in a manner that does not identify you personally) for any purpose permitted under applicable law.

As a convenience to our visitors, this Davinta website may contain links to a number of sites that we believe may offer useful information. The policies and procedures we described here

may not apply to those sites. We suggest contacting those sites directly for information on their privacy, security, data collection, and distribution policies.

We will process, disclose or share your Personal Data only if required to do so by law or in good faith belief that such action is necessary to comply with our contractual obligations, legal requirements or legal process served on us.

7. WITHDRAWAL OF CONSENT

If you change your mind after opting-in, you may withdraw your consent to contact you, for the continued collection, use or disclosure of your information, at any time, by mailing us at sladdha@davintafinserv.com]

However, if you have availed any of our services, we shall have the right to continue processing your information till such engagement persists. However, we shall not retain your data and information if it is no longer required by us and there is no legal requirement to retain the same. Do note that multiple legal bases may exist in parallel and we may still have to retain certain data and information at any time.

8. RIGHT TO RECTIFICATION

In the event that any personal data provided by you is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data at our end immediately. We urge you to ensure that you always provide us with accurate and correct information/data to ensure your use of our services is uninterrupted.

9. CONTACTING DAVINTA

If you have any question about this Privacy Policy or wish to contact us for any reason in relation to the Personal Data processing, please contact us by mailing us sladdha@davintafinserv.com