

# **DATA SECURITY & PRIVACY POLICY**

#### PREAMBLE:

GINEO FINTECH Pvt Ltd. hereafter referred to as GINEO is committed to maintaining the security, integrity and confidentiality of all the personal information of its users. We follow the highest standards of privacy and security to protect your personal information. This Privacy Policy explains how we protect the personal information of users that we acquire from our website/app. It also outlines how we use that information in connection with the service offered through the Site and App. 'Personal information' for purposes of this Policy means information that identifies you, such as your name, address, phone number or email address etc.

#### **COLLECTION OF PERSONAL INFORMATION:**

We will only use the information we collect about you lawfully and in accordance with the Information Technology Act, 2000, the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 and other applicable laws of India. We may collect your personally identifiable information such as name, postal address, e-mail address and phone number, the device's phone number, SIM card, age, username, password and other registration information, financial and credit information, personal description, photograph names, credit or debit card information and other payment instrument details etc. which you voluntarily provide to us for facilitating the services provided by the Company. Depending on the activity, some of the information we ask you to provide is identified as mandatory and some is identified as voluntary. If you do not provide the mandatory information for a particular activity, you will not be permitted to engage in that activity. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we may not be able to provide you with our services or respond to any queries you may have. Company and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising.

## **USE OF USER INFORMATION:**

GINEO, reserves the right to perform statistical analysis of user behavior and preferences in order to measure users' relative interests in the various areas of the website/app for the purpose of product and service development. The analytical data that GINEO, collects is for internal use only. We use analytics and reporting technologies to record non-personal information such as internet domain and host names, internet protocol (IP) addresses, browser software, operating system types, clickstream patterns, and the dates and times that the website/app services are accessed. We also contract with several online partners to help manage, monitor and optimize our website/app services to help us measure the effectiveness of our advertising, communications and how visitors use the website/app.

## **NON-PERSONAL INFORMATION:**

We use non-personally identifiable information to troubleshoot, administer the Platform, analyze trends, gather demographic information, comply with applicable law, and cooperate with law enforcement activities. We may also share this information with our authorized third party service providers and advertisers to measure the overall effectiveness of our online advertising, content, and programming.

## **NON-DISCLOSURE OF INFORMATION:**

GINEO, pledges that it shall not sell or rent Users' personal details to anyone. GINEO, will protect every bit of the Users' business or personal information and maintain the confidentiality of the same. With this seal of trust, it makes its services available to the Users for assessment and analysis that include credit and behaviour scoring, market and product analysis.

#### **PRIVACY POLICIES OF THIRD PARTY PLATFORMS:**

This Privacy Policy only addresses the use and disclosure of information we collect from you. Other websites that may be accessible through this Platform have their own privacy policies and data collection, use and disclosure practices. If you link to any such website, we urge you review the website's privacy policy. We are not responsible for the policies or practices of third parties.

#### YOU ARE RESPONSIBLE FOR MAINTAINING THE CONFIDENTIALITY OF YOUR LOGIN ID AND PASSWORD:

User is responsible for maintaining the security of his/her login id and password, and may not provide these credentials to any third party. If a user believes that these credentials have been stolen or been made known to others, he/she must contact GINEO, immediately. GINEO is not responsible if someone else accesses a user's account through registration information they have obtained from the user or through a violation of this privacy and security policy by the user.

## **CHANGES TO PRIVACY POLICY:**

In the event GINEO, modifies this Privacy Policy, the same will be updated on the Website. In case of any material changes to the Policy, the Users will be notified by email (sent to the email address specified in the User's account) or by means of a notice on this Website prior to the change becoming effective. The Users are encouraged to periodically review this page for the latest information on its privacy practices.

# **ACCEPTANCE OF PRIVACY POLICY:**

By using our website, app and/or any products, you are accepting the practices set out in this privacy policy.

# **MISCELLANEOUS PRIVACY ISSUES:**

Children: Minors under the age of 18 may not use the Platform. We do not collect or maintain information from anyone known to be under the age of 18 and no part of the Platform is designed to attract anyone under the age of 18.

**Public Areas**: We may provide areas on our Platform where you can publicly post comments and information about yourself or can review products and submit media content. This information may be accessible by other consumers and companies and may appear on other websites or web searches, and therefore this information could be read, collected, and used by others. For example, if you post your email address along with a public review, you may receive unsolicited messages. We have no control over who reads your postings or what other users may do with the information you voluntarily post, so please use caution when posting any personal information.

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