

PRIVACY POLICY

1. INTRODUCTION

- 1.1. This Privacy Policy (“**Policy**”) outlines Neokred Technologies Private Limited’s (“**Neokred**”, “**we**”, “**our**” or “**us**”) practices in relation to the storage, use, processing, and disclosure of your personal data that may be accessed by us, or you may have chosen to share with us when you access, use, or sign up for our Platform.
- 1.2. Please note that unless specifically defined in this Policy, capitalised terms shall have the same meaning ascribed to them in our Website Terms, (“**Terms**”). Please read this Policy in conjunction with the Terms.
- 1.3. At Neokred, we are committed to protecting your personal data and respecting your privacy. Please read this Policy carefully to understand our practices regarding your personal data and how we will treat it. This Policy sets out the basis on which any personal data we collect from you, we collect about you, or that you provide to us, will be processed by us.
- 1.4. By providing us with the consent to process your personal data, you acknowledge that we will collect, store, use, and disclose your personal data in accordance with this Policy.

2. THE DATA WE COLLECT ABOUT YOU AND HOW WE USE IT

- 2.1. We collect, use, store, transfer, or otherwise process personal data about you to provide you with access and use of the Platform to the extent permissible under Applicable Law. Please find below the personal data that we process to provide you our Platform, and the associated purposes for processing:

S.No.	Categories of Personal Data	Datasets Processed	Purpose of Processing
1	Identity	First and last name.	Customer onboarding, provision of the Platform, customer support.
2	Profile	Username and password.	Customer onboarding, provision of the Platform, customer support.
3	Contact	Phone number, email address and address.	Customer support, promotional and marketing communications.
4	Technical	Internet protocol address, browser type and versions, time zone settings, operating systems, device information.	Analytics and fraud prevention.

5	Usage	Information about how you interact with the Platform and its interface.	Analytics.
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- 2.2. We are required to collect your personal data to provide you with access to the Platform or when we comply with a legal obligation. In certain cases, we are required to collect personal data as required by law or under the Terms. If you fail to provide us such personal data as and when requested by us, we may not be able to perform our obligations under the arrangement we have with you or are trying to enter into with you or your employer (for example, to provide you with features of the Platform). In this case, we may have to limit your access to or use of the Platform (or part thereof).
- 2.3. Where necessary to provide you with the Platform or where necessary under Applicable Laws, we may request for and process additional personal data relating to you.
- 2.4. We may also collect, use, and share aggregated data such as statistical or demographic data, for any purpose. Aggregated data could be derived from your personal data but is not considered personal data under Applicable Laws. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific feature of the Platform.

3. HOW WE COLLECT DATA ABOUT YOU

We use different methods, as permitted under Applicable Laws, to collect and process personal data about you. This includes:

- (a) Information you provide us: This is the information you choose to provide when you use the Platform or when you correspond with us (for example, by email or chat or through the Platform). It includes information you provide when you register to use the Platform, use a feature of the Platform, share data through the Platform, or report a problem with the Platform. If you contact us, we will keep a record of the information shared during the correspondence.
- (b) Information we collect about you and your device: Each time you access the Platform, we will automatically collect personal data, including device and usage data. We collect this data using cookies and other similar technologies.
- (c) Information we receive from other sources, including third parties and publicly available sources: We may receive personal data about you from various third parties, such as analytics providers, advertising networks, search information providers, and other publicly available sources.

4. HOW WE SHARE YOUR PERSONAL DATA

- 4.1. You agree and acknowledge that any and all personal data pertaining to you, may be shared by us with our group companies or third parties including financial institutions, vendors, service

providers, and business partners, for the purposes detailed in this Policy, in accordance with your consent where required under Applicable Laws.

- 4.2. You agree and acknowledge that by creating an account, you authorise us, our associate partners, and Affiliates to contact you via email, phone, or otherwise. This is to ensure that you are aware of all the features of the Platform.
- 4.3. You agree and acknowledge that we may share data where we are required by law, any court, government agency, or authority to disclose such personal data.

5. DATA SECURITY

- 5.1. We implement adequate security measures to protect your personal data from unauthorised access in compliance with the security practices and procedures as prescribed under Applicable Law.
- 5.2. While we facilitate issuance of Products by Issuing Entities, we are not responsible for the manner in which such Issuing Entities may process your personal data.
- 5.3. Where you have been provided credentials to access the Platform, or certain parts thereof, you are responsible for keeping these credentials secure and confidential. We will not be responsible for any unauthorised use of your personal data, for any lost, stolen, or compromised credentials, or for any activity on your account due to such unauthorised disclosure of your credentials. In the event your credentials have been compromised in any manner whatsoever, you should promptly notify us to enable us to secure your account.

6. DATA RETENTION AND DESTRUCTION

- 6.1. You agree and acknowledge that your personal data will continue to be stored and retained by us for as long as necessary to fulfil our stated purpose(s) and for a reasonable period after termination of your account in compliance with Applicable Laws.
- 6.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 6.3. Upon completion of the retention period for each category of personal data as described above, we shall delete or destroy, to the extent technically possible, personal data in our possession or control, or render the personal data into anonymised data, so that it no longer constitutes personal data, in which case we may use this information indefinitely without further notice to you.

7. YOUR LEGAL RIGHTS

- 7.1. Under certain circumstances and subject to Applicable Laws and the Terms, you may have certain rights in respect of your personal data, such as the right to review and correct your personal data or revoke or deny consent.
- 7.2. If you wish to exercise any of the rights set out above, please write an email to the Grievance Officer, whose details are mentioned in Section 13 of this Policy.

8. TRANSFER OF PERSONAL DATA

Please note that all your personal data is only stored on systems located within India. We do not transfer your personal data to any third country.

9. LINKS TO THIRD PARTY WEBSITES

The Platform may contain services provided by or links to and from the websites of our partner networks, service providers, financial institutions, and advertisers. Please note that the Third Party Services that may be accessible through the Platform are governed by their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through such Third Party Services. Please check their policies before you submit any personal data to such websites or use their services.

10. COOKIES

- 10.1. Cookies are small data files that are stored on your device. We use cookies and other tracking technologies to distinguish you from other users of the Platform and to remember your preferences. This helps us provide you with a good experience when you use the Platform and also allows us to improve the Platform.
- 10.2. We identify you by way of using cookies. The cookies shall not provide access to data in your device, such as email addresses or any other data that can be traced to you personally. The data collected by way of cookies will allow us to provide you with a tailored and user-friendly experience. The cookies shall enable you to access certain features of the Platform. Most devices can be set to notify you when you receive a cookie or prevent cookies from being sent. If you prevent cookies from being sent, it may limit the functionality that we can provide when you access the Platform.
- 10.3. Additionally, you may encounter cookies or other similar technologies on certain aspects of the Platform that are placed by third parties. We do not control the use of cookies by such third parties.

11. BUSINESS TRANSITIONS

You agree and acknowledge that in the event we go through a business transition, such as a

merger, acquisition by another organisation, or sale of all or a portion of our assets, your personal data may be among the assets transferred.

12. CHANGE IN PRIVACY POLICY

- 12.1. We keep our Policy under regular review and may amend it from time to time at our sole discretion.
- 12.2. The terms of this Policy may change, and if they do, these changes will be posted on this page and, where required by Applicable Laws, notified to you.

13. GRIEVANCE OFFICER

You may contact us at rohitbadri@neokred.tech with any enquiry relating to this Policy or an enquiry relating to your personal data (including reviewing or updating). You can also do so by writing to our Grievance Officer at the address provided below:

Name: Rohit Badri

Designation: Senior Risk and Compliance Officer

Email Address: rohitbadri@neokred.tech

We endeavour to resolve any issues you may be facing with our handling of your personal data the best we can.