



## **PRIVACY POLICY**

This privacy policy ("**Policy**") is owned by Korefi Business Solutions Private Limited ("**the Company**"). It helps Users understand Our approach to processing of personal data. We treat data privacy with utmost care and diligence and maintain transparency to disseminate information on how Your personal data may be used by Us.

The Policy uses terms in the context as follows:

(i) "**We**", "**Us**" "**Our**" or "**Platform**" refers to the Company, its group companies and affiliates, the website [www.aiaccountant.com](http://www.aiaccountant.com), its services, features, and related web-based applications as the context may require; and

(ii) "**You**", "**Your**" or "**User**" refers to all body corporates, its employees, and/or any person using the Platform or providing personal data to Us in any form.

### **Applicability**

This Policy applies to Personal Data of any natural person that is collected, received, stored, processed or otherwise handled by the Platform in connection with the provision of Services, whether such Personal Data is collected directly from You or is digitized after being collected in physical form. This Policy also applies where the Company distributes, refers, integrates, or acts as an agent, reseller or implementation partner in relation to any products or services not directly offered by the Company but made available to You through or in connection with the Platform. In the event You are using the Platform or Services as an authorised signatory, authorised representative, employee, consultant, director, or other authorised person of a body corporate or non-individual entity, this Policy shall apply to Your Personal Data as well. Terms and conditions, product-specific agreements and any other consents that You may give to or for the benefit of the Company may contain additional privacy-related provisions. This Policy does not limit or supersede any such specific terms or consents. Any information that is available in the public domain, or which is otherwise made publicly available by You or any third party, does not form part of this Privacy Policy.

Your use or access of the Platform shall confirm Your understanding, acknowledgement and acceptance of this Policy. By using Our Platform, You expressly consent to the Platform's use of Your personal data in accordance with this Policy. If You do not agree with our policies and our practices as described in this Policy, You must not access the Platform or provide any personal data to us or You may contact Us in the manner provided in this Policy.

### **Privacy**

User privacy is of utmost importance to Us. We follow systematic and stringent procedures to protect the security of the Personal Data stored by Us. The information that Users share is stored in secure servers with encryption and can be accessed only for authorized purposes. All Personal Data is shared on a need-to-know basis only.



## Data

**“Personal Data”** as per applicable laws, means any data about an individual who is identifiable by or in relation to such data and generally includes information such as name, contact information, communications, financial identifiers, online identifiers, device information, and any other data classified as personal data under applicable law.

The data collected or received could include Your name, address, signatures, date of birth, copies of identity cards (ID), contact details including electronic mail ID and phone number, address, previous names, maiden names, domicile, origin, citizenship, nationality, residence, any legal or other identifiers like Permanent Account Number (PAN) / Taxpayer Identification Number (TIN) / Aadhaar/ National ID/ Social Security Number/ or its equivalent, photograph and gender, data that identifies (whether directly or indirectly) a particular individual, such as information You provide on any forms, surveys, online applications or similar online fields, demographic information in aggregated or de-identified form, bank account details, card details, UPI handles, income details, history in relation to these, employment / occupational information, residential status under tax laws, payments / receipts / borrowing history, risk profile, preferences and any other information to provide Our services to you, information collected when you make or receive payments, employer's name and address, if self-employed, type of account, and nature and volume of anticipated business dealings, income proof , bank statements, financial documents and returns, tax certificates, data that is collected when You make financial transactions such as amount sent or requested, amount paid for products or merchant information, including information about any funding instruments used to complete the transaction, information about visits to the platform website, website traffic data, location data, weblogs, internet browser, IP address, information collected through tracking technologies, communications with the Platform or any of its representative, any data derived from User Data or other sourced data such as behavioural projections, profiling, analytical results, reports (prepared by Us or others) including through any algorithms, analytics, software, automations, log-in IDs, password or PINs in encrypted form, information related to data access, correction, restriction, deletion, porting requests and complaints, CCTV images at Our offices, conversations during meetings / calls/ correspondences with Our staff, behavioural details, browsing actions, patterns and online activity, records of Our communication with You, including electronic mail, telephone conversations, live chat, instant messages and social media communications containing information concerning your grievances, complaints and dispute, any other information or Personal Data that You consent to share.

If you provide Personal Data about someone else (for example, information or data about a spouse or financial associate or employer), or someone provides Personal Data about You, such Personal Data may be used by Us in the manner specified in this Privacy Policy. In order to provide Our services securely, enhance customer experience and for purposes of marketing our services, Personal Data about You may be obtained from other sources, such as our referral partners, who are also bound by confidentiality obligations with Us.

We do not ask for personal security details. If any request for personal security details is received, You are expected to not respond to it and contact us immediately.

## Collection

We receive Your Personal Data through multiple sources, such as when you submit the Data to us, make enquiries, or opt for Our services, use the services, transact, engage, use our website / platform, email or call, raise a complaint / grievance, through third parties, from information publicly available and through cookies.

Information about your web-based activity is collected using technology known as cookies, which can often be controlled through internet browsers. The Platform uses cookies to uniquely recognize your device and web



browser, as well as to improve the performance and quality of our platform and services. In this policy, the term “cookies” means small data files that a website transfers to your device when you visit it. We may use both session-based cookies (which are deleted automatically when you close your browser) and persistent cookies (which stay on your device until you manually remove them or they expire). You can delete persistent cookies by following the directions provided in your browser’s “Help” section. Please note that if you block or disable cookies, certain features of the Platform might not function correctly or may become unavailable.

The Platform also works with selected third-party analytics and advertising partners that may gather non-personally identifiable information about your activity on our website, including how you interact with our Platform, use Our features, and avail services, through their own cookies and similar technologies. These Partners may use details of your visits to the website and other sites to serve you tailored advertisements related to products and services. Importantly, no personally identifiable information is collected or shared in this process. These third parties never receive your name, email address, phone number, physical address, or any other personal details.

You can prevent this anonymous data from being shared with third parties at any time by turning off or blocking cookies in your browser preferences. The steps differ depending on which browser you use — please check your browser’s help menu or support pages for instructions on how to manage cookies. If the User disables cookies later, any prior information collected by Platform from existing cookies may still be stored.

We assume that all information provided by You is true, accurate, current, non-misleading, consistent and relevant on the date when it is provided. If any person other than You, submits Your Personal Data to Us, we shall reasonably assume that such person or persons have been authorised by You to submit such Personal Data to Us, and till further validation or rejection from You such Personal Data shall be processed in terms of this Privacy Policy.

## Usage

The Platform always processes Your Personal Data within the permissible usages as mentioned in this Privacy Policy.

The Platform may partner with other service providers (“Partners”) to offer certain facilities to its Users. Any Personal Data shared by the Platform with these Partners is limited to such information as is reasonably necessary for the Partners to perform the services that Our Users may specifically select. The Platform also urges its Partners to ensure that Personal Data is processed in a manner consistent with the Privacy Policy. We do not use or disclose personal information other than in terms of this Privacy Policy. We do not sell, distribute or lease Personal Data to any third parties.

We use Personal Data for activities such as the following: (i) to carry out Users instructions (ii) to enable You to use Our website, platform and online services (iii) to provide additional features of the Platform (iv) to notify changes / additions to Our services, terms and conditions, fees, policies or other information (v) for customer service and product development, including answering questions and responding to feedback and complaints, (vi) to perform data analytics and evaluate the effectiveness of any campaign in encrypted form (vii) to establish contact and manage relationship with You (viii) to participate in interactive features or testing models in encrypted form (ix) to improve features and services (x) to improve customer training, quality monitoring and user experience (xi) to liaise with Our Partners to provide selected services to Our Users (xii) to send offers based on previous services and interests, (xiii) for surveys and market research of additional services in encrypted form (xiv) to collect, analyse and use feedback, reviews, testimonials, and user experiences relating to the Platform or Services, including publishing such testimonials for promotional or informational purposes, (xv) matters incidental or necessary to the above. We may share Personal Data with Our subsidiaries / group companies and Partners to the extent required and who are related to the provision of selected services to Our Users.



Additionally, the Platform may disclose Personal Data to third parties when We in good faith believe that such disclosure is reasonably required (i) by law, (ii) by any statutory, regulatory or judicial body (iii) for any other reason that the User consents to (iv) to comply with legal processes, such as a search warrant, subpoena, statute, or court order (v) protect Our rights, reputation, and property, or that of Our users, affiliates, or the public.

Third-party servers or networks may place links on Our digital interface. These third-party servers or networks use technology to re-direct to / from other websites / platforms and may automatically receive User IP address. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content. The Platform does not provide any identifiable personal information to these third-party servers or networks without Users consent. If the User responds to such links, the advertiser or ad-server may conclude that Users fit the description of the audience they are trying to reach. Users should consult the respective privacy policies of these third -party servers or networks separately. This Privacy Policy does not apply to collection of data directly by the third-party servers or networks and the Platform does not accept any responsibility or liability of data privacy that these third-party servers or networks may have.

### **Retention of Information**

We do not store Users credit card information or passwords / PINs.

The Personal Data we collect will be securely stored with us or with our Partners for the purposes mentioned above beyond the expiry of transactional or account based relationship with You only if required to: (a) to comply with any contractual, legal or regulatory obligations to which we are subject (b) for establishment, exercise or defence of legal claims and dispute resolutions (c) audit, compliance, fraud detection norms, legal or regulatory inquiries, security incident investigation or law enforcement requirements (d) as specified in this Privacy Policy (e) in accordance with specific consents. Notwithstanding the generality of the foregoing, Your Personal Data shall be retained or deleted by the Platform in strict compliance with statutory and regulatory requirements applicable from time to time, with appropriate notice to You in case deletion is statutorily mandated.

### **Security**

The Company is ISO 27001:2022 certified and SOC 2 Type 2 tested. We have stringent security measures to protect the loss, misuse, unauthorized use and alteration of the information provided by Users to the Platform through physical, technological and organizational safeguards. If you have questions regarding the security of Your Data, you can contact us at [consent\_manager@aiaccountant.com].

Your Personal Data is stored in India by the Company in secure servers with encryption. We also undertake appropriate measures to control access to our computer resources and periodically review the logs to detect any unauthorized access. The Company also has security measures in place to prevent and report, if necessary, any loss of Personal Data and remediation to prevent recurrence. In the event of any security breach of Personal Data, the Platform shall intimate the occurrence of such breach individually to each of its affected Users without delay.

### **International Users**

The Platform is governed by laws of India. If any User provides Personal Data pertaining to a foreign national ("**Foreign National**"), it shall be the responsibility of the User to keep such Foreign National informed of the contents of the Privacy Policy and take consent for the processing of such Personal Data in terms of this Privacy Policy. By providing Personal Data of such Foreign National to the Platform, it shall be deemed that the User has obtained consent of the Foreign National for their Personal Data to be collected, processed and stored in India in terms of this Privacy Policy. If the User is a Foreign National, it shall be deemed that the Privacy Policy has been read and understood by the User prior to provision of Personal Data to the Platform.



## User Rights

By providing information to Us and/or by accessing the Platform and/or by continuing to use the Platform, You consent to the collection and use of Your Personal Data in accordance with this Privacy Policy. Further, by undertaking User initiated actions such as checking boxes, submitting forms, registering for an account-based relationship, or using any feature of the Platform, You shall be providing consent to the use of Your Personal Data in terms of this Privacy Policy. You also acknowledge that the Privacy Policy shall supersede any and all prior or bilateral arrangements, understandings, or non-disclosure agreements between You and the Company to the extent they relate to the handling, usage, or protection of your data. You shall be able to view the information that you have provided to the Platform and update the information on a periodical or ad-hoc basis. You may request access, correction, updation or erasure of your Personal Data that You have submitted to the Platform. In the event you wish to withdraw your consent to further processing of Your Personal Data, or raise any grievances pertaining to Your Personal Data, You may do so by following the procedure mentioned in this segment. We may continue to retain certain Personal Data in accordance with the segment on Retention of Information in this Policy. The withdrawal of consent may also impact the provision of all or certain services being provided to you at the time of such request. You may also nominate another individual to exercise Your User rights as per applicable laws from time to time.

To access, correct, update or erase Your Personal Data, you may send an e-mail to [consent\_manager@aiaccountant.com] from your registered e-mail ID or write via post to our registered office address through a signed letter. After successful verification of your request, the Company shall promptly, but in no later than 30 business days, give effect to Your request. If you are not satisfied with the result of Your communication with Us even after 90 (ninety) days from the date of your request, you may write to the Data Protection Board (“DPB”) through their dedicated online portal or mobile app, as may be made available by the DPB.

## Data Pertaining to Minors

The Platform is not designed for use by minors, nor does it offer any services to minors. We do not knowingly collect, process or store personal data of children as defined under applicable law. Users are advised to ensure that no data relating to minors is submitted to the Platform. We do not take any liability or responsibility for inadvertent submission of data pertaining to minors by Our Users.

## Updates to the Privacy Policy

Our Privacy Policy may contain relevant updates from time to time, including necessary version changes. Users are advised to read the Privacy Policy periodically. By continuing to use Our services, you shall be accepting changes to the Privacy Policy, if any.