Privacy Policy

OUR BASE POLICY:

- 1. User data must be handled with extreme care. We do not share or allow for accidental disclosure of user data.
- 2. We adhere to best in class industry standard data protection practices and shall have our systems audited by trusted third-parties periodically.
- This Privacy Policy ("Policy") outlines Khatabook Technologies Private Limited ("Khatapayments", "we" or "us") practice in relation to the storage, use, processing, and disclosure of personal data that you have chosen to share with us when you access our website "https://khatapayments.com" ("Website"), or personal data that we may have access to in relation to your use of the Website's offerings and features ("Services").
- 2. At Khatapayments, we are committed to protecting your personal data and respecting your privacy. Please read the following terms of the 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 or about you, or that you provide to us, will be processed by us.
- 3. Capitalised words in the Policy shall have the same meaning ascribed to them in the Terms and Conditions ("Terms"), available at [https://khatapayments.com/terms]. Please read this Policy in consonance with the Terms.
- 4. By using the Website, you consent to the collection, storage, use, and disclosure of your personal data, in accordance with, and are agreeing to be bound by this Policy. We will not collect any information from you, except where it is knowingly and explicitly provided by you.
- 5. This Policy together with any terms of the arrangement we have with you applies to your use of:
 - the Website, once you have downloaded the same onto your mobile phone or handheld device; and
 - any of the Services that are available on the Website.
- 6. This policy is provided in a layered format, so you can explore the specific areas set out below.
 - Personal data we collect about you
 - How your personal data is collected
 - Authenticity of personal data and information
 - How we use your personal data and for what purposes
 - Transfer of personal data
 - Cookies
 - Data security
 - Data retention
 - Business transitions
 - Change in privacy policy

THE DATA WE COLLECT ABOUT YOU

- 1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed for example, anonymous data.
- 2. We collect, use, and store data about you to provide you with or in connection with the Services, that you may choose to provide to us. Such personal data includes:

Identity data - data pertaining to your identity and related data, such as your first and last name, username or similar identifiers, gender, title, passwords, feedback, survey responses, etc.; Contact data - including email addresses, phone numbers, social media information, etc.; KYC data – including documents issued by the government such as Aadhaar, PAN Card, Voter ID, Ration Card, etc;

Financial data – transaction data including details of Services you have availed and details of payments you have made through the Website;

Device data – including IP addresses, browser types and versions, time zone settings and locations, operating systems, device information, Wi-Fi and mobile networks and other technology on the devices you use to access the platform;

Usage data - including information about how you use our Services;

- 3. We also collect, use, and share aggregated data such as statistical or analytical 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 Services.
- 4. We do not collect, use, store or transfer any personal data which form the contents of the documents accessed by the Website to provide you with or in connection with the Services.
- 5. We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.
- 6. Where we need to collect personal data by law, or under the terms of the arrangement we have with you, and if you fail to provide that 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 (for example, to provide you with features of the Services). In this case, we may have to cancel or limit your access to the Services, but we will notify you if this is the case at the time.

HOW YOUR PERSONAL DATA IS COLLECTED

- 1. We have taken all reasonable steps to ensure that the information on the Website is authentic.
- 2. You agree that the information and personal data you provide us with are true, correct, and accurate. We shall not be liable for any incorrect or false information or personal data that you might provide
- 3. You may review the information and personal data that you have provided during your use of the Website and choose to correct or modify the same. You may do so by writing to us or our Grievance Officer at the address provided in Section 9 of this Policy.

HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

- 1. We will only use your personal data as the law allows us to. Most commonly, we will use your personal data to provide you with the Services, or where we need to comply with a legal obligation.
- 2. You are aware that by using our Services on the Website, 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 Services
- 3. You are aware that any and all information pertaining to you, whether or not you directly provide it to us (via the Services or otherwise), including but not limited to personal correspondence such as emails, instructions from you, etc., may be collected, compiled and shared by us in order to render Services to you and you expressly authorise us to do so. This may include but not be limited to storage providers, data analytics providers, consultants, lawyers, and auditors. We may also share this information with our subsidiaries, affiliates or any of their holding companies.
- 4. In general, we will not disclose personal data except in accordance with the following purposes/activities, undertaken without direct human supervision or control:
 - To register you as a user;
 - To deliver Services;
 - To manage our relationship with you including notifying you of changes to any Services;
 - To deliver content to you;
 - To monitor trends so we can improve the Services;

To perform our obligations that arise out of the arrangement we are about to enter or have entered with you;

To enforce the terms of the arrangement we have with you;

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and

5. We will process personal data under direct human supervision or control only if: Specific affirmative consent has been obtained to access certain messages; It is necessary to administer and protect our business and the Services including troubleshooting, data analysis and system testing;

It is necessary to comply with a legal or regulatory obligation; or Such use or processing otherwise is limited to internal operations.

6. You authorise us to send you electronic alerts and messages for details pertaining to registration on the Website as a user and requirements arising out of the provision of Services.

DATA SECURITY

1. We implement certain security measures including encryption and firewalls to protect your personal information from unauthorised access and such security measures are in compliance with the security practices and procedures as prescribed under the Information Technology Act, 2000 and the applicable rules (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information Rules, 2011). However, you agree and acknowledge that the above-mentioned measures do not guarantee absolute protection to the personal information and by accessing the Services, you agree to assume all risks associated with disclosure of personal information arising due to breach of firewalls and secure server software.

- 2. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.
- 3. We will comply with the requirements under the Information Technology Act, 2000 and the rules made thereunder in the event of a data or security risk.

DATA RETENTION

You are aware that your personal data will continue to be stored and retained by us for a reasonable period after termination of your use of our Services on the Website.

BUSINESS TRANSITIONS

You are aware 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 might be among the assets transferred.

CHANGE IN PRIVACY POLICY

We keep our Policy under regular review and may amend this Policy from time to time, at our sole discretion.

The terms of this Policy may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by email. The new Policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the Services.