

PRIVACY POLICY

This Privacy Policy ("Policy") outlines Digio Internet Private Limited ("Digio", "we", or "us") practices 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://user.digio.link/ (the "Platform"), or personal data that we may have access to in relation to your use of Platform or access to our account aggregation services (collectively, "Services").

At Digio, 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.

Capitalised words in the Policy shall have the same meaning ascribed to them in the Terms and Conditions ("**Terms**"), available at https://user.digio.link/ Please read this Policy in consonance with the Terms.

By using the Platform, you consent to the collection 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.

This Policy together with any terms of the arrangement we have with you applies to your use of the Services.

1. THE DATA WE COLLECT ABOUT YOU

- (a) 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.
- (b) Please note that in accordance with applicable laws, we do not store or use any financial data that you choose to share with third parties or otherwise transmit through our Services ("Financial Data"). You may use our Services to transmit and share Financial Data with third parties; however, we will not have access to such data. For more information on how your Financial Data is transmitted through our Services, please review our Terms.

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- (c) We may collect, use, store and transfer different kinds of personal data about you to provide you with, or in connection with, the Services. Such personal data includes:
 - (i) Data pertaining to your identity and related data, such as your first and last name, username or similar identifiers, gender, title, passwords, identity document and proof of addresses, purchases or orders of or through our Services, feedback, survey responses, etc.;
 - (ii) Contact data, including email addresses, phone numbers, delivery addresses, business addresses, etc.;
 - (iii) Data we collect in connection with our KYC processes when you choose to access certain features of our Services, including documents issued by the government such as Aadhaar, driving licences, PAN cards, voter ID cards, ration cards, etc.;
 - (iv) Data about your device, including but not limited to:
 - <u>Location</u> location data recorded on your device; and
 - <u>Device Information</u> including hardware model, operating system and version, IMEI and serial numbers, user profile information, IP addresses, browser types and versions, time zone settings, and Wi-Fi and mobile networks.
 - (v) Usage data, including information about how you use our Services; and
- (d) We also collect, use, and share aggregated data such as statistical data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data under applicable laws.
- (e) 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.

2. AUTHENTICITY OF INFORMATION

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- (a) We have taken all reasonable steps to ensure that the information on the Platform is authentic.
- (b) You agree that the personal data you provide us with is true, correct, and accurate. We shall not be liable for any incorrect or false information or personal data that you might provide.

3. HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

- (a) 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.
- (b) You understand that when you consent to providing us with your personal data, you also consent to us sharing such data with third parties. However such personal data will be shared with third parties only for the purpose of providing you the Services. You are aware that by using our Services on the Platform, 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.
- (c) 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 provide the Services to you and you expressly authorise us to do so. This may include but not be limited to storage providers, marketing partners, data analytics providers, consultants, lawyers, and auditors. We may also share this information with our subsidiaries, affiliates, or any of their holding companies.
- (d) You agree and acknowledge that we may share data without your consent, when it is required by law or by any court or government agency or authority to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or the terms of the arrangement we have with you, or in order to comply with any applicable laws and regulations.
- (e) In general, we will not disclose personal data except in accordance with the following purpose/activity:
 - (i) to register you as a user of the Platform;
 - (ii) to deliver Services;



- (iii) to manage our relationship with you including notifying you of changes to any Services;
- (iv) to administer and protect our business and the Services including troubleshooting, data analysis and system testing;
- (v) to deliver content and advertisements to you;
- (vi) to measure and analyse the effectiveness of the advertising we serve you through means which include surveys, contests and promotions;
- (vii) to monitor trends so we can improve the Services;
- (viii) to perform our obligations that arise out of the arrangement we are about to enter or have entered with you;
- (ix) to enforce the terms of the arrangements we have with you;
- (x) 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
- (xi) to comply with a legal or regulatory obligation.
- (f) You authorise us to send you electronic alerts and messages for details pertaining to registration on the Platform, requirements arising out of the provision of Services, and advertising.
- (g) Further, you agree to receive promotional and other emails and other forms of communication from us. Through such communication you will receive information about the latest developments on the Services. You may unsubscribe from our mailing list at any time, via the unsubscribe option we offer.

4. COOKIES

- (a) We "Cookies" is a term generally used for small text files a web site uses to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising, preferences etc. Cookies also exist within mobile applications when a browser is needed to view certain content or display an advertisement within the Platform. Digio may use "cookies" as required on the Platform.
- (b) Cookies themselves do not personally identify You, but it identifies Your device. Generally, cookies work by assigning a unique number to the computer that does not have a meaning beyond the assigning site.
- (c) Digio cannot control the use of cookies or the resulting information by advertisers or third



parties hosting data on Digio's Platform. If You do not want information collected through the use of cookies, they may change the settings in the browsers that allows to deny or accept the cookie feature as per Your discretion and in the manner agreed by them.

5. DATA SECURITY

- (a) 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.
- (b) 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.
- (c) 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.

6. CHANGE IN PRIVACY POLICY

- (a) We keep our Policy under regular review and may amend this Policy from time to time, at our sole discretion.
- (b) 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.

7. GRIEVANCE OFFICER

You may contact us at support@digio.link 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, established in accordance with the Information Technology Act, 2000 and



rules made thereunder, at the address provided below:

Grievance Officer

Registered Address: J 304 Bren Avalon Chinnapanahalli, Bangalore

Email Address: support@digio.link