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## PRIVACY POLICY

Finnew Solutions Private Limited (hereinafter referred to as **“We/Our/Niyo/Company”**) is fintech company providing digital banking solutions to our customers (hereinafter referred to as **“Customer/You/Your/User”**) is committed regarding your privacy, confidentiality and security of personal information that resides with the Company. Keeping personal information of customers secure and preventing any misuse thereof, is therefore, a top priority of the Company.

This Privacy & Security Policy (hereinafter referred to as **“Privacy Policy”**) describes how Niyo collects and handles certain information it may collect and/or receive from you via the use of this Website (www.goniyo.com) and various NIYO Mobile application available at Android/iOs platforms (Website and the Mobile Applications are collectively referred to as **“Website”**). This Privacy Policy applies to current and former visitors to our Website. By visiting and/or using/downloading our Website, you are accepting and consenting to the practices described in this Privacy Policy. The statements & procedures mentioned under this Privacy Policy must be read in conjunction with our general term & conditions available at the Website.

You accept this Privacy Policy when you visit our Website, sign up for, access, or use our products, services, content, features, technologies or functions offered on our Website and all related sites, applications, and services (collectively referred to as **“Niyo Services”**).

### I. POLICY REVIEW, UPDATES AND APPLICABILITY.

- a. This Privacy Policy applies to the Personal Information (which means any information/ documents/ details that relates to a natural person, which either directly or indirectly in combination with other information available with Niyo, can identify such person) and such other information as mentioned section II of this Privacy Policy.
- b. This Privacy Policy is intended to govern the use of Niyo Services by our Customers (including, without limitation those who use the Niyo Services in the course of their trade or business) unless otherwise agreed through contract.
- c. We may amend this Privacy Policy at any time by posting a revised version on our Website. The revised version will be effective as of the published effective date. In addition, if the revised version includes a substantial change, we will provide you with prior notice by posting notice of the change on the “Policy Updates” page.
- d. After this said notice period, you will be considered as having expressly consented to all amendments to this Privacy Policy.

## II. INFORMATION COLLECTED

- a. We collect the following types of personal information in order to provide you with the use of NiYO Services, and to help us personalize and improve your experience.
  - i. **Device Information**-When you use Niyo Services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information.
  - ii. **Cookies** -We also collect anonymous information through our use of cookies and web beacons. We may collect and store any information you provide us when you use Niyo Services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you otherwise correspond with us regarding Niyo Services.
  - iii. **Credit information report** - Your Credit Information (credit score and credit information report) is procured through a 'soft search' of your credit records with Credit Information Companies "CICs" and Niyo has no control over the content or accuracy of information provided in your credit information by CICs. Niyo gets this information from CIC for and on your behalf only when you agree to appoint Niyo as your lawfully appointed authorized agent/ representative for collecting your credit information from CICs. By consenting to use and avail your credit information report through Niyo, you agree that Niyo and CICs shall be entitled to rely on your authorization and consent granted by you to Niyo.
  - iv. **Other general information including personal information**- When you use Niyo Services, we also collect information about your transactions and your activities. In addition, if you open a Niyo account or use Niyo Services, we may collect the following types of information applicable on the Niyo services:
    - 1. Contact information, such as your name, address, phone, email and other similar information
    - 2. Financial information, such as the full bank account numbers and/or credit card numbers that you link to your Niyo account or give us when you use Niyo Services.
    - 3. Detailed personal information such as your date of birth or national ID number.
    - 4. Income proof, PAN, credit score, credit information report, e-KYC through UIDAI, CKYC through CERSAI etc.
    - 5. We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, your results when you respond to a survey, your interactions with members of the Niyo corporate family or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole).

6. Additionally, for quality and training purposes or for its own protection, Niyo may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with Niyo, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.
7. After obtaining the User's specific consent to allow the App to access the User's SMS inbox, we may collect relevant information from text messages (SMS) received by the Users from providers of services and/or products (including but not limited to retail outlets, financial institutions, mobile carriers and utility companies), that will enable us to provide better access to financial services and products to the Users. We will only access business messages that originate from alphanumeric senders.
8. In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with Niyo Services. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.
9. We may offer you the ability to connect with Niyo Services using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices.
10. When you download or use our mobile applications, or access one of our mobile optimized sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to control or disable location services in the device's settings menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacture of your particular device.

### **III. EXPRESS CONSENT**

- a. You expressly consent to Niyo (including its marketing channels and business partners) to provide the details/documents/information mentioned hereinabove under section (ii) for the purpose stated under this Privacy Policy.
- b. You while providing your details/documents over the Website, including but not limited to the personal information or other information as mentioned hereinabove (ii), expressly consent to Niyo (including its marketing channels and business partners) to contact you through SMS, call and/ or e-mail and to follow up calls in relation to the Niyo Services provided through the Website, for imparting product knowledge, offering promotional offers running on Website & various other offers offered by its business partners.
- c. You hereby authorize and expressly consent us to share your Personal information with third parties including but not limited to Banks, credit information bureaus, government agencies for completion of the services availed.

- d. You hereby grant your unambiguous, free and express consent to authorize and appoint Niyo to request and obtain, collect, receive and/or fetch your credit score and/ or a copy of your credit information report from CIC, for and on your behalf;

#### **IV. PURPOSE OF COLLECTING THE DATA**

- a. Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:
  - i. provide Niyo Services and customer support; process transactions and send notices about your transactions; verify your identity, including during account creation and password reset processes;
  - ii. resolve disputes, collect fees, and troubleshoot problems; manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities; detect, prevent or remediate violations of policies or applicable user agreements; improve the Niyo Services by customizing your user experience; measure the performance of the Niyo Services and improve their content and layout;
  - iii. manage and protect our information technology infrastructure; provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences; contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our User Agreement; perform creditworthiness and solvency checks, and compare information for accuracy and verify it with third parties.
  - iv. We will also use the User information to enable activities and transactions that need to occur during the process of lending, such as:
    - 1. Generating and maintaining User profiles on the App.
    - 2. Provide personalized features.
    - 3. Aiding financial services organizations to provide better services.
    - 4. Facilitating collection activities as needed.
    - 5. Maintaining regular communications with the User concerning transactions the User initiates, such as requesting information or assistance, submitting a loan request, making payments, transferring funds, etc.
    - 6. Modifying the App from time to time to cater to the User's interests.
    - 7. Providing the App and the functions and features therein, efficiently.
    - 8. Preserve social history as governed by existing law or policy.

#### **V. REASONABLE SECURITY PRACTICES FOR PROTECTION OF PERSONAL INFORMATION**

- a. Throughout this Privacy Policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

- b. We store and process your personal information on our computers where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. We have fully ensured that the reasonable security practices adapted by Niyu are fully in compliant with the applicable laws and at par with the industry standards.

## **VI. SHARING OF PERSONAL INFORMATION ALONG WITH PURPOSE OF SHARING**

- a. Niyu will not sell or rent your personal information to anyone, for any reason, at any time. However, we will be sharing your Personal information with our affiliates and business partners where we feel that you will be assisted better for the purpose of availing the Niyu Services. We may share your personal information with:
  - i. Members of the Niyu corporate family, to provide joint content, products, and services (such as registration, transactions and customer support), to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services, and communications. Members of our corporate family will use this information to send you marketing communications only if you have requested their services.
  - ii. Financial institutions and Banks that we partner with to jointly create and offer a product. These financial institutions may only use this information to market Niyu-related products, unless you have given consent for other uses.
  - iii. Credit bureaus and collection agencies to report account information, as permitted by law.
  - iv. Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you meet their criteria which includes having Niyu close your Niyu account due to your breach of Niyu's User Agreement).
  - v. Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice.)
  - vi. Law enforcement, government officials, or other third parties pursuant to a subpoena/ summon, court order, or other legal process or requirement applicable to Niyu or one of its affiliates; when we need to do so to comply with law or debit/ credit card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.
  - vii. Other unaffiliated third parties, for the following purposes:
    - 1. Fraud Prevention and Risk Management: to help prevent fraud or assess and manage risk. For example, if you use the Niyu Services to buy or sell goods, we may share account information in order to help protect your account from fraudulent activity, alert you if we detect such fraudulent activity on your accounts, or evaluate credit risk.

2. As part of our fraud prevention and risk management efforts, we also may share necessary account information in cases where Niyu has placed a hold or other restriction on your Account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share account information to enable them to operate their programs for evaluating buyers or sellers.
3. Customer Service: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
4. Shipping: in connection with shipping and related services for purchases made using Niyu.
5. Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
6. Service Providers: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, KYC document collection, marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
7. Other third parties with your consent or direction to do so.

## **VII. COOKIES POLICY**

- a. We use data collection devices such as "cookies"/similar, etc on certain pages of the app to help analyse our app page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on your device hard-drive/storage that assist us in providing our services. We offer certain features that are only available through the use of a "cookie".

## **VIII. PROCEDURE FOR CHOICE/OPT-OUT**

- a. We may combine your information with information we collect from other companies and use it to improve and personalize Niyu Services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs, you can write us to [privacy@goniyu.com](mailto:privacy@goniyu.com)
- b. Please note that it may take about 72 business hours to process your request. In furtherance to your usage of the Website, you expressly waive the Do Not Call (DNC) / Do Not Disturb (DND) registrations on your phone/mobile numbers for contacting you for such purpose and usage. Hence, there will be no DNC / DND check required for the number you may have left on our Website. Such modes of contacting you may include sending SMSs and/ or telephonic calls.

## **IX. RETENTION OF DATA**

- a. Niyu will retain your information for as long as it is necessary for providing you the Niyu Services available on the Website or your request for termination of your

account with Niyo, whichever is later. Furthermore, Niyo may also be obligated to retain certain information under the applicable law and/or as part of its contractual obligations with the Banks/Financial Institutions and accordingly such information shall be retained as prescribed under the applicable law or part of Niyo's contractual obligation.

- b. Post termination of your relationship, Niyo may continue to use your anonymized data aggregated or in combination with anonymized data of other users. We use this aggregated anonymized data for data analysis, profiling and research purposes, for example to gain insights about our users and their profiles. We may keep your contact information along with your application details (if any) for fraud prevention purposes and for the exercise/ defense of a legal claim or for providing evidence in legal proceeding(s).

#### **X. INTIMATION BY CUSTOMERS REGARDING CHANGE IN PERSONAL INFORMATION**

- a. If there are any changes in the personal information shared by you with Niyo, you can contact our customer support or write to us on [privacy@goniyo.com](mailto:privacy@goniyo.com).

#### **XI. LINK TO OTHER PLATFORMS**

- a. Our app links to other platform that may collect personally identifiable information about you. Niyo is not responsible for the privacy practices or the content of those linked platforms.

#### **XII. IMPORTANT DISCLAIMERS**

- a. If you request for opening a Niyo account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a Niyo website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. Niyo is not responsible for the content or information practices of such third parties.
- b. Niyo is committed to adequately protecting your personal information regardless of where the data resides and to providing appropriate protection for your personal information.
- c. You can also request for closure of your account through the Niyo Customer Service Centre. If you close your Niyo account, we will mark your account in our database as "Closed," but may retain personal information from your account for a certain period of time to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.
- d. If you choose to use our referral service to tell a friend about the Website or the Niyo Services, we may ask you for your friend's name, phone number and email address. We will automatically send your friend a message inviting him or her to visit the Website. We store this information for the sole purpose of sending this message and tracking the success of our referral program.

### XIII. CONTACT US OR GRIEVANCE REDRESSAL

- a. If you have grievance or complaint, questions, comments, concerns or feedback in relation to the processing of information or regarding this Privacy and Security Policy or any other privacy or security concern, send an e-mail to [privacy@goniyo.com](mailto:privacy@goniyo.com)
- b. The name and contact details of the Grievance Officer is provided below: -

Name : Vivek Bagree

Email : [privacy@goniyo.com](mailto:privacy@goniyo.com)

Address: 5th Floor, Delta Block, Sigma Technology Park, Varthur Rd, Phase 2, Whitefield, Bengaluru, Karnataka 560066

This Privacy Policy is published and shall be construed in accordance with the provisions of ***Information Technology Act, 2000*** and rules made thereunder including the ***Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011*** as amended thereof and other applicable law enacted from time to time.