

PRIVACY POLICY

Effective Date: 04th February 2022

Thank you for showing interest in RapiPay Fintech Private Limited. We value the trust you place in us. We are committed to protecting your privacy. This Privacy Policy explains how we collect, use and share your personal information. This Privacy Notice applies to your use of our website, and/or Services, and covers information collected in connection with your access to and use of our website and/or Services. Please read this Privacy Notice carefully. By continuing to interact with us, you are consenting to the practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use or access our Website and/ or Services.

Our Privacy Policy is subject to change from time to time without notice and it is strongly recommended that you periodically review our Privacy Policy as available on the Application/Website.

INFORMATION THAT WE COLLECT AS YOU USE OUR SERVICES

We collect or receive information you provide when you apply, use or sign up for/on a RapiPay AEPS/MATM/POS/QR/PG/Acquiring or other Services, go through our identity or account verification process, authenticate into your account, communicate with us, answer our surveys, upload content, or otherwise use the Services.

We collect or receive information about you when you use our AEPS/MATM//POS/QR/PG/Acquiring and/or Services, including:

- **Identification Information.** Your name; email address; mailing address; mobile/phone number; photograph; birthdate; passport, driver's license, PAN, or other government-issued identification; or other historical, contact, and demographic information when you apply, use or sign up for a RapiPay AEPS/MATM/POS/QR/PG/Acquiring and/or other Services, signature, and authentication credentials (for example, information you use to login to your account), including IP address.
- **Background Information.** To the extent permitted by applicable laws, we may obtain background check reports from public records of criminal convictions and arrest records. We may use your information, including your full name, government-issued identification number, and date of birth, to obtain such reports.
- **Financial Information.** Information such as bank account, payment card numbers, credit reports, and other publicly available information.
- **Credit, Compliance and Fraud.** Information about you from third parties in connection with any credit investigation, credit eligibility, identity or account verification process, fraud detection process, or collection procedure, or as may otherwise be required by applicable law. This includes, without limitation, the receipt and exchange of account or credit-related information with any credit reporting agency or credit bureau, where lawful, and any person or corporation with whom you have had, currently have, or may have a financial relationship, including without limitation past, present, and future places of employment, financial institutions, and personal reporting agencies.

- **Transaction Information.** When you use our AEPS/MATM/POS/QR/PG Acquiring and/or other Services to make, accept, request, or record payments, we receive information about when and where the transactions occur, the names of the transacting parties, a description of the transactions, the payment or transfer amounts, billing and shipping information, and the devices and payment methods used to complete the transactions.
- **Other Information You Provide.** Information that you voluntarily provide to us, including any survey responses; participation in contests, promotions, or other prospective seller marketing forms or devices; suggestions for improvements; referrals; or any other actions performed on the Services.

INFORMATION WE COLLECT OR RECEIVE FROM YOUR USE OF OUR POS AND/OR SERVICES

We collect or receive information about you and the devices you use to access the PoS and/or Services, such as your computer, mobile phone, or tablet. The information that we collect or receive includes:

- **Precise Geolocation Information.** The location of your device.
- **Device Information.** Information about your device, including your hardware model, operating system and version, device name, unique device identifier, mobile network information, and information about the device's interaction with our Services.
- **Use Information.** Information about how you use our Services, including your access time, "log-in" and "log-out" information, browser type and language, country and language setting on your device, Internet Protocol ("IP") address, the domain name of your Internet service provider, other attributes about your browser, mobile device and operating system, any specific page you visit on our website/platform, content you view, features you use, the date and time of your visit to or use of the Services, your search terms, the website you visited before you visited or used the Services, data about how you interact with our Services, and other clickstream data.
- **Business Information.** Information about products and services you sell (including inventory, pricing and other data) and other information you provide about you or your business.
- **Customer Information.** Information you collect from your customers, including email address, phone number, payment information, or other information.

We only collect and use such information from you that we consider necessary for achieving a seamless, efficient and safe experience, customized to your needs and use the personal information to provide products to you, enhance the operation of the Application/ Website, improve our marketing and promotional efforts, analyse Application/ Website use, improve our product offerings, to personalise your experience and to provide you a better experience.

HOW WE USE YOUR INFORMATION

We may use information about you in the following ways, including:

Providing, Improving, and Developing our Services

Processing or recording payment transactions or money transfers;
 Otherwise providing you with the RapiPay products and features you choose to use;

Displaying your historical transaction or appointment information;
Providing, maintaining and improving our Services;
Developing new products and services;
Delivering the information and support you request, including technical notices, security alerts, and support and administrative messages including to resolve disputes, collect fees, and provide assistance for problems with our Services or your RapiPay account;
Improving, personalizing, and facilitating your use of our Services;
Measuring, tracking, and analyzing trends and usage in connection with your use or the performance of our Services.

Communicating with You About our Services

Sending you information we think you may find useful or which you have requested from us about our products and services;
Conducting surveys and collecting feedback about our Services.

Protecting our Product and Services and Maintaining a Trusted Environment

Investigating, detecting, preventing, or reporting fraud, misrepresentations, security breaches or incidents, other potentially prohibited or illegal activities, or to otherwise help protect your account, including to dispute chargebacks on your behalf;
Protecting our, our customers', or your customers' rights or property, or the security or integrity of our Services;
Enforcing our Terms of Use or other applicable agreements or policies;
Verifying your identity (e.g., through government-issued identification numbers);
Complying with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
Fulfilling any other purpose disclosed to you in connection with our Services;
Contacting you to resolve disputes, collect fees, and provide assistance with our Services.

Advertising and Marketing

Communicating with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys, and rewards offered by us and select partners;
If we send you marketing emails, each email will contain instructions permitting you to "opt out" of receiving future marketing or other communications.

Other Uses

For any other purpose disclosed to you in connection with our Services from time to time.

Any information that you provide directly to a third-party merchant, website or application is not covered by this privacy notice. We are not responsible for the privacy or security practices of merchants or other third parties with whom you choose to share your personal information directly. We encourage you to review the privacy policies of any third party with whom you choose to share your personal information directly

HOW WE SHARE YOUR INFORMATION

We may share information as per terms of this Privacy Policy, however we shall endeavor that such use of information does not create hindrance on your use of our application/services. We do not share your personal information with third parties other than as follows:

"Others working for us." We use certain trusted third parties to provide, maintain, and improve our Services, including service providers who access information about you to perform services on our behalf (e.g., fraud prevention, identity verification, and fee collection services), as well as financial institutions, payment networks, payment card associations, credit bureaus, partners providing services on RapiPay behalf, and other entities in connection with the Services.

With third parties; to help us provide, improve, protect, and promote our application (such as third-party analytics tools to help us measure traffic and usage trends for our application). These third parties will access your information only to perform tasks on our behalf and in compliance with this Privacy Policy.

With our Affiliates; With our group companies and corporate affiliates, for the purposes outlined herein.

"Business Transfers and Corporate Mergers." To a subsequent owner, co-owner, or operator of one or more of the Services; or

In connection with (including, without limitation, during the negotiation or due diligence process of) a corporate merger, consolidation, or restructuring; the sale of substantially all of our stock and/or assets; financing, acquisition, divestiture, or dissolution of all or a portion of our business; or other corporate change.

"Generally with your Consent." Any information or content that you voluntarily disclose for posting on our application may become available to the public, as controlled by any applicable privacy settings that you set. To change your privacy settings on our application, you may change your profile setting. Once you have shared the content/data or made it public, that content/data may be re-shared by others.

"Enforcing Rights." We may also disclose personal information to enforce our policies, respond to claims that a posting or other content violates others' rights, or protects anyone's rights, property or safety.

"Law & Order." We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to: (a) comply with the laws; (b) protect any person from death or serious bodily injury; (c) prevent fraud or abuse of our name, brands, trademarks or such other rights belonging to us or our other users; or (d) protect our rights.

We also may share (within our group of companies or with third parties) aggregated and anonymized information that does not specifically identify you or any individual user of our Services

Stewardship of your data is critical to us and a responsibility that we embrace. We believe that our users' data should receive the same legal protections regardless of whether it's stored on our servers or on their home computer systems or devices. While complying with the directions issued by the statutory authorities, our endeavour shall be to protect the interest of users and follow transparency.

HOW LONG WE RETAIN YOUR INFORMATION

We will retain your personal information for as long as we need it.

We can retain copies of information about any transactions or Services in which you may have participated for a period of time that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce our Terms of Use or other applicable agreements or policies, or to take any other actions consistent with applicable law.

SECURITY PRECAUTIONS

The Website/App intends to protect your personal information and to maintain its accuracy as confirmed by you. We implement reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. We also require that our registered third party service providers protect such information from unauthorized access, use and disclosure.

Our Platform has stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavour to safeguard and ensure the security of the information provided by you. We use Secure Sockets Layers (SSL) based encryption, for the transmission of the information, which is currently the required level of encryption in India as per the law. Nevertheless, the internet is not a 100% secure environment, and we cannot guarantee absolute security of the transmission or storage of your information.

THIRD-PARTY ADVERTISING AND ANALYTICS

- We can use third-party service providers to provide site metrics and other analytics services. These third parties can use cookies, web beacons, and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our Services, webpages viewed, time spent on webpages, links clicked, and conversion information (e.g., transactions entered into). This information can be used by RapiPay and third-party service providers on behalf of RapiPay to analyze and track usage of our Services, determine the popularity of certain content, and better understand how you use our Services. The third-party service providers that we engage are bound by confidentiality obligations and other restrictions with respect to their use and collection of your information.

This Privacy Notice does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties' privacy policies. For more

information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices.

YOUR CONSENT

By using the Website/App and/ or by providing your information, you consent to the collection and use of the information you disclose on the Website in accordance with this Privacy Policy, including but not limited to Your consent for collecting, using, sharing and disclosing your information as per this privacy policy.

You have acknowledged that the Privacy Policy contained herein have been explained to you in vernacular language and you have understood the contents thereof.

If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

YOUR CHOICES

Personal Information

You may access, change, or correct information that you have provided by logging into your RapiPay account at any time or by making a request to us on support@rapipay.com, in which case we may need to verify your identity before granting access or otherwise changing or correcting your information.

Deactivating Your Account

If you wish to deactivate your account, you can do so by logging into your RapiPay account or by emailing us on: support@rapipay.com.

Location Information

In order to provide certain Services, we may require access to location information, including precise geolocation information collected from your device. If you do not consent to collection of this information, certain Services will not function properly and you will not be able to use those Services.

Promotional Communications

You can opt out of receiving promotional messages from RapiPay by following the instructions in those messages, by informing the caller that you would not like to receive future promotional calls, or by changing your notification settings by logging into your RapiPay account. You may only opt-out of text messages from RapiPay by replying STOP. Opting out of receiving communications may impact your use of the Services. If you decide to opt out, we can still send you non-promotional communications, such as digital receipts and messages about your account or our ongoing business relations.

SECURITY

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, the internet is not a 100% secure environment, and we cannot guarantee absolute security of the transmission or storage of your information. We hold information about you both at our own premises and with the assistance of third-party service providers.

JURISDICTION

All disputes, differences and/or claims arising out of, or relating to, or in connection with this Privacy Policy or the breach, termination or validity hereof shall be referred to Sole Arbitrator, to be jointly appointed by both the Parties, in accordance with the Arbitration and Conciliation Act, 1996, as amended from time to time. The seat of the arbitration shall be New Delhi, India. The award given by the arbitrator shall be final and binding on both the Parties. The language of the arbitration proceedings and award shall be English. The arbitration proceeding shall be kept confidential and will not be open for public.

COMMUNICATION WITH COMPANY

We welcome your comments or questions regarding this Privacy Policy. Please contact our Customer Care Department and/or Grievance Officer –Mr. Jithin Karkera with any questions or concerns regarding this Privacy Notice and/or security by writing an email on grievanceofficer@rapipay.com.

You may contact us at the following address: RapiPay Fintech Private Limited A-8, 8th Floor, (Q-Tower), Sector-68, Noida – 201309.

If you have any questions or concerns regarding our notice, or if you believe our notice or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with our Privacy Department listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.