

PRIVACY POLICY

This Privacy Policy is published in compliance of the Information Technology Act, 2000; and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the "SPI Rules").

By accessing and using the website i.e. www.fingy.ai including any other media form, media channel, mobile website, or mobile application related or connected thereto and further including any amendments/ modification/ update thereon (hereinafter referred as "Website"), which is operated and managed by E-Revbay Private Limited (hereinafter collectively referred to as "Company"/ "ERB") incorporated under the Companies Act, 2013 You the User herein whether registered or not ("user") are authorizing us and our associate partners to contact the User with regards to offers and promotions for their services along with the product which the User have opted for. In addition, we might contact the User to offer promotional offers running on this Website & offers offered by the associated third parties. By registering, User is further authorizing us hereby to call the User for products and services in spite of the fact that the User may be registered in the DND (Do not Disturb) / DNC (Do not Call) registry.

ERB recognizes the importance of maintaining the User's privacy. ERB is committed to maintain the confidentiality, integrity and security of all information of our users. This Privacy Policy describes how ERB collects and handles certain information it may collect and/or receive from the User via the use of this Website/ Application. This Privacy Policy applies to current and former User/s. By visiting and/or using this Website, by selling/availing any Financial Products or service by/through ERB, the User agree to this Privacy Policy.

What we do

E-Revbay Private Limited is a registered with various Banks/ NBFCs/ Principal/ Financial Institutions as Corporate Direct Selling Agent (DSA). We collect Leads/ Files of the Customers looking for any Secured and Unsecured Loans/ Credit Cards etc. through our registered partners/distributors and we further Login the loan application with the respective Banks/ NBFCs/ Principle/ Financial Institutions on behalf of the customer.

WE DO NOT LEND MONEY IN ANY MANNER NOR GUARANTEE ANY LOAN DISBURSMENT OF ANY KIND WHATSOEVER.

This Website/ Mobile Application version is merely for the Lead management purposes wherein the registered user (partner/distributor) can upload basic details with respect to the various Leads in addition to the KYC documents of the Lead.

The Work flow

ERB collects information when the User (Partner/Distributor) registers for an account, when the user avails products or services of ERB, and/or visits ERB Website/Mobile application. When the User registers with ERB, the User is asked for submitting certain information which may be personal to the User such as first name, last name, state and city of residence, email address, mobile number, date of birth etc. Once the User registers with ERB, the User is not anonymous to ERB. Also, the User is asked for the contact

number during registration and opts in for messages, notifications about our services to the wireless device/s. By registering the user authorizes ERB to send messages and email alerts to the User with User's respective login details and any other service requirements, including promotional mails and messages.

The User will have to register on the website/ Mobile Application. Post registration, the user will have to select the desired Financial Services like Home Loan, Personal Loan, Credit Card etc. The User will then fill up the Lead form and upload the required documents. ERB will then Login the Lead with respective Banks/ NBFCs/ Principle/ Financial Institutions for further processing and fulfilment. The user received regular updates on the lead from ERB via notifications. The user is also alerted about his commissions on the ERB mobile application.

Documents/ Details we collect

At the time registration/ Sign up, the details we ask pertaining to the User are as below: -

- Name of the User
- Email id of the User
- Mobile no of the User
- Type of User Profile (Company/ Individual etc)
- KYC details of the User
 - a. Adhar Card (Data entry)
 - b. PAN No (Data Entry)
 - c. Adhar Card (Upload)
 - d. PAN No (Upload)
- Bank A/c Details of the User
- Location of the User (Pin-Code)
- GST details of the User
 - a. GST Number (Data Entry)
 - b. GST (Upload)
- Other details as may be required

In the Lead form/s, the User will enter the details pertaining to the Lead/ Customer and upload the documents of the Lead/ Customer which are as below

- Customer Name,
- Customer email id
- Customer Phone no
- KYC details of the Customer
 - Adhar Card number (Data Entry + Upload)
 - PAN Card (Data Entry + Upload)
- Customer Address
- Customer Employment status
- Customer Income Details
- Required loan amount/ sum insured/ investment amount/ Credit card as the case may be
- Tenure of Loan

- Bank Statement
- Other details as may be required

The User hereby acknowledges that the liability of the content so uploaded/ submitted shall at all times remain with the user and the user is solely responsible for authentication of the same. ERB will merely Log in the documents so uploaded/ submitted with the respective Bank/ Authority for the sole purpose of Lead fulfilment thereon. ERB is committed towards maintaining the privacy of the User's data and may process with the uploaded/ submitted content in order to serve the customer with better services.

Purposes of collection of the data

We use User's information in order to:

- To establish identity and assess applications;
- Monitor, improve and administer this Website;
- Design and offer customized products and services offered by our third-party partners, manage our risks including the risk of fraud that may be committed against Us or our User/s;
- Analyze how this Website is used, diagnose service or technical problems and maintain security;
- Send communications notifications, information regarding the products or services requested by the User or process queries and applications that the User has made on this Website;
- Manage Our relationship with User and provide the User with or inform the User about other products or services We think User might find of some use;
- Conduct data analysis in order to improve the Services provided to the User;
- Use the User's information in order to comply with country laws and regulations;
- To conduct KYC for our third party partners based on the information shared by the User for the provision of Services. This would include conducting analysis of User's bank statements and eKYC. ERB, may directly or through third parties, conduct the KYC on its customers. In the event the KYC as detailed under this clause is being conducted by its third party service providers, ERB shares User's relevant information with such third party service providers for availing the said services;
- To authenticate EPF details from User's previous records, check User's previous employment details, and check PAN status, using the required details;
- For cross sell and up sell of Financial products and services;
- Use the User's information in other ways permitted by law.
- respond to queries or requests submitted by the User.
- process orders or applications submitted by the User.
- administer or otherwise carry out our obligations in relation to any agreement with our business partners.
- anticipate and resolve problems with any services supplied to the User.
- to send information about special promotions or offers to the User. We might also tell the User about new features or products. These might include offers or products from our business partners (such as insurance companies etc.) or third parties (such as marketing partners and other service providers etc.), with whom www.fingy.ai has a tie-up.

- to make our website and the services offered by E-Revbay Private Limited (ERB) better. We may combine information we get from the User with information about User we get from our business partners or third parties.
- to send notices, communications, offer alerts relevant to the use of the Services offered on this Website.
- as otherwise provided in this Privacy Policy.
- Some features of this Website will require the User to furnish the User's personally identifiable information as provided by the User.

App Permissions

We ask for the following app permissions while using the mobile version;

- Storage
- Media files (Photos, Videos, Music & Audio)
- Notifications

*In case the User is enabled with the In-App dialer services, we may ask for the additional permission to those respective users only which are as below;

- call logs
- contacts
- draw over another app
- permanent notification
- check in check out

WE **DO NOT record the calls made by/through the Dialer. The Dialer is a mere enabler/identifier of incoming and outgoing calls, enter disposition/s, generate calling reports, upload, add-delete team members and has certain other similar functions. For In-App dialer enablers, During the User's sign in, the user will get a pop-up notification in the smart phone after every incoming and outgoing call.*

The said permissions are required for uploading and downloading the documents/ files through the app for smooth functioning of the Lead process, Lead submission, fulfilment and Lead record thereon. The said data/ files/ documents are utilized for the sole and exclusive purpose of Business. We do not in any manner use the said data for any other purpose.

By using and/or registering at this Website/ Application, User authorizes ERB (including its representatives, affiliates, and its business partners) to use the content uploaded/ updated/ submitted by the user for the business purposes of ERB including but not limited KYC documents, Bank details and any other details/ information (photos/image/pdf/any other form of files).

When the user installs the mobile application version, some of the information are/ may be auto-captured which may include operating system running on the device, time stamp, basic information linked from the Email/ social media account for registration, profile picture, KYC details etc. We will retain the information to provide the services as long as we require subject to compliance with the applicable laws, so as to supply the user with better services.



When the user on onboard and application process, the users can upload their profile picture by way of accessing user's camera or using the upload image functionality for the sole purpose of identifying that it is a human who is creating a profile or an application in the App and for user identification purpose only. These images are used for identification purposes only and are not shared with any third parties. The user image is displayed in the personal profile section. ERB do not use the images for any other purpose and we do not share the images with any third parties. ERB take reasonable measures to protect the information we collect from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. ERB use industry-standard encryption technology to protect your personal information during transmission and storage. The Users have the right to access, modify, or delete the image at any time.

By using and/or registering at this Website/ Application, User authorizes and grants unconditional consent to ERB (including its representatives, affiliates, and its business partners) to allow them to use such details/ data/ files as may be accessed through the website/ Application and to contact the User via email or phone call or SMS and offer our services for the product/services, imparting product knowledge, offer promotional offers running on ERB and offers by its business partners and associated third parties, for which reasons User's information may be collected in the manner as detailed under this Policy. User hereby agrees that User authorizes ERB to contact the User for the above-mentioned purposes even if the User is registered under DND or DNC or NCPR service(s). User's authorization, in this regard, shall be valid as long as User's account on this Website is not deactivated by either User or us.

Third Party Advertising

We may use third-party advertising companies and/ or ad agencies to serve ads on this Website. These companies may use information (not including the name, city, email address or telephone number) about User's visits to this and other web sites in order to provide advertisements on this site and other sites about goods and services that may be of interest to the User.

Privacy Policy Changes

ERB may amend this policy from time to time, at our discretion. The user is requested to visit this Website and review the most updated version of the policy. The Company reserves the right at any time, at our sole discretion, to change or otherwise modify the Policy without prior notice, and the same shall be deemed to be reviewed and accepted by the Users.

Controllers of Personal Information

User's personal data will be stored and collected by ERB.

Cookies

A cookie is a piece of data stored on the user's computer tied to information about the user. We may use session ID cookies. For session ID cookies, once User closes the browser or logs out, the cookie terminates and is erased. Session ID cookies may be used by PRP to track user preferences while the user is visiting the website. They also help to minimize load times and save on server processing. Persistent cookies may be used by PRP to store whether, for example, the User want the password



remembered or not, and other information. Cookies used on the PRP website do not contain personally identifiable information.

Information Sharing and Disclosure

ERB may share User's Information submitted on this Website to any third party/service provider/business partner without obtaining User's prior consent in the following limited circumstances:

When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing these Terms and Conditions; for complying with the applicable laws and regulations.

ERB proposes to share such information within its group companies and officers and employees of such group companies for the purpose of processing personal information on its behalf. We also ensure that these recipients of such information agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

ERB may use third-party advertising companies to serve ads when the user, visits this Website. These companies may use personal information about the user's visit to this Website and other websites in order to provide advertisements about goods and services of interest to the user.

ERB shall transfer information about User in case ERB is acquired by or merged with another company.

Security

We employ appropriate technical and organizational security measures at all times to protect the information we collect from the User. We use multiple electronic, procedural, and physical security measures to protect against unauthorized or unlawful use or alteration of information, and against any accidental loss, destruction, or damage to information. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Further, the User is responsible for maintaining the confidentiality and security of the login id and password, and may not provide these credentials to any third party.

Links to Other Websites

There might be affiliates or other sites linked to this Website. Personal information that the User provided to those sites are not our property. These affiliated sites may have different privacy practices and we encourage the User to read their privacy policies of these website when the User visits them.

Governing Law and Dispute Resolution

This Policy shall be governed by and construed in accordance with the laws of the Republic of India. The courts at Mumbai, India shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.



Changes in this Privacy Policy

ERB reserves the right to change this policy from time to time, at its sole discretion. We may update this privacy policy to reflect changes to our information practices. We encourage the User to periodically review.

Contact Us

For any information or clarification regarding the use of personal information or this Privacy Policy, Please contact us at support@finqy.ai