

PRIVACY POLICY

We at **Dexif Fintech Private Limited** and its subsidiaries (hereinafter referred as “**Dexif**”, “**we**”, “**us**” or “**our**”) are committed to protecting personal data and respecting privacy of the users of the website described herein (“**User**”, “**you**” or “**your**”).

This privacy policy document (“**Privacy Policy**”) is published in accordance with the provisions of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 which requires the publishing of a Privacy Policy for handling of or dealing in personal information including sensitive personal data or information (“**Personal Information**”). This Privacy Policy sets out how we collect, share, and process Personal Information of Users collected from or through the website <https://www.dexif.in/> (“**Website**”).

This Privacy Policy applies to the collection, receipt, storage, usage, processing, disclosure, transfer and protection of your Personal Information when you use our Website or avail any services offered by Dexif, and does not extend to any information collected and/or by the websites or applications of any third-parties.

Our Users’ privacy is extremely important to us. We recognize the privacy concerns of the Users and hence as a commitment to provide safe and secure experience on our Website, we have formulated this Privacy Policy to help Users make an informed decision.

BY USING THE WEBSITE OR AVAILING ANY SERVICES OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND AGREE TO BE BOUND BY THE PRIVACY POLICY. YOU HEREBY CONSENT TO OUR COLLECTION, USE AND SHARING, DISCLOSURE OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE THE WEBSITE OR ANY SERVICES OR GIVE US ANY OF YOUR INFORMATION. IF YOU USE THE WEBSITE OR SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY (SUCH AS YOUR EMPLOYER), YOU REPRESENT THAT YOU ARE AUTHORISED BY SUCH INDIVIDUAL OR ENTITY TO (I) ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL’S OR ENTITY’S BEHALF, AND (II) CONSENT ON BEHALF OF SUCH INDIVIDUAL OR ENTITY TO OUR COLLECTION, USE AND DISCLOSURE OF SUCH INDIVIDUAL’S OR ENTITY’S INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

Legal Basis

This Privacy Policy is meant to help the Users understand what information we collect, why we collect it, what information we disclose and how the Users can update, manage, export, and delete their information. It shall be in compliance with the following:

- Digital Personal Data Protection Act, 2023;
- The Information Technology Act, 2000 and rules thereunder;

- The Information Technology (Reasonable Security Practices and Procedures and Personal Information) Rules, 2011 (the “IT Rules”), and
- The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

Consent

By accessing our Website and continuing to use our services, the Users will be deemed to have read, understood and agreed to the terms as provided in this Privacy Policy. By granting their assent to this Privacy Policy, the Users provide consent to such utilisation, collection and disclosure of Personal Information as prescribed in this Privacy Policy, including the transfer of Personal Information to third-party service providers as may be required for the purpose of providing and improving the services.

We reserve the right to update or change our Privacy Policy at any time and the Users should check this Privacy Policy periodically. We advise the Users to check the Privacy Policy available on the Website from time to time, provided however that any material changes to the Privacy Policy will be informed to the Users at the contact and notice details provided by the Users. Continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute the Users’ acknowledgment of the modifications and their consent to abide and be bound by the modified Privacy Policy. Users have the right to opt out of the Website and/ or services at any moment. In addition, the Users, by sending an email to contact@dexif.in, can inquire whether the Company is in possession of their personal data, and they may also require the Company to delete and destroy all such information, upon request.

In the event any services are used on behalf of any other individual, or on behalf of any entity, the Users represent that they are authorised to accept this Privacy Policy and share such data as required on behalf of such person or entity and have obtained necessary consents from such third parties.

Information We Collect

All information directly collected by Dexif is with the Users’ consent. The Company is however free to use, collect, and disclose information of the Users which is in the public domain.

Information collected from Website visitors may include:

- Name, email address, phone number, birth date, age, employment details, gender and designation of the Users
- Address (including country and pin/postal code)
- Information on the device such as the make, model, operating system, IP address, location, and other information required for us to provide services.
- Location, if not disabled.
- Financial and KYC information (such as passport, driving licence, PAN, proof of possession of Aadhaar number, Voter’s Identity Card issued by the Election Commission of India, job

card issued by NREGA duly signed by an officer of the State Government, or letter issued by the National Population Register containing details of name and address)

- Demat Account details
- Records of interaction with Dexif's representatives
- Your usage details such as time, frequency, duration and pattern of use, features used and the amount of storage used
- Website analytics and behavioural metrics
- Cookies and Web Beacon data
- Data from third parties who have explicit consent to lawfully share that data
- In the event a User reports an issue with the Website or any service, we may also screen/video record the User's device while using the Website or service for a limited time period to help us better understand how to address the issue.
- Any other Personal Information that is willingly shared by you

How we collect Personal Information

The methods by which we collect your Personal Information include but are not limited to the following:

1. When you access our Website or use any features of our Website;
2. When you provide your Personal Information to us via forms;
3. During the course of services provided to you by us;
4. Through your computer/device, once you have granted permissions to our Website;
5. Through Dexif's representatives or third-parties, or
6. Through use of cookies (also discussed below)

We collect information that your browser/app sends whenever you visit our Website. In addition, we may use third party services to collect, monitor and analyse data. This information is kept completely secure. If a User chooses to sign up with an external authentication service, e.g. Google Sign-In, we will fetch and store email address, name and profile image URL from this service.

If Dexif has reasons to suspect that the information provided by any User is misleading, inaccurate, obsolete or incomplete, then Dexif reserves the right to refuse provision of the services to the User, at its sole discretion without incurring any liability to the User or any third party. We will not be liable for reliance on or consequences of any misleading, inaccurate, obsolete or incomplete information.

How it is used:

Dexif offers online platform system for carrying out transaction that collects such personal data or information to process your financial and non-financial transaction requests. The Personal Information so collected may be shared with SEBI/ NSE/ BSE, KYC Registration Agencies (KRAs) etc. solely for the purpose of processing your transaction requests or serving you better.

We may use your Personal Information to investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our Terms of Use, breach of our agreement with you or as otherwise required by law (collectively referred to as “**Purpose(s)**”).

We may also use your Personal Information in accordance with applicable laws to provide you with the services, enhance the user experience, manage our relationship with you, build user insights, analyse data for the introduction of new services and features, and as may be required to comply with any regulatory requirements and contractual obligations, which may inter alia include:

- To create and maintain User accounts, including personalization to improve the user experience;
- To process information such as credit card payments and provide support services related to payment, billing and invoicing;
- To engage certain trusted third parties to perform functions and provide services to us, including KYC verification, cloud-hosting services, off-site backups, email service providers, and customer support providers. We will only share Personal Information with third parties to the extent necessary to perform these functions, in accordance with the purposes set out in this Privacy Policy and applicable laws;
- To improve and enable Users to use the Website and avail our services, and ensure efficient customer care experience, increasing efficiency of existing features, and develop new features;
- To perform research and analysis for our understanding, information, analysis, services and technologies in order to provide all users improved quality of care; and ensuring that the content and advertising displayed are customized to your interests and preferences;
- To dispatch transaction-related communications such as welcome letters and billing reminders;
- To notify the necessary information related to the Website and services and User accounts on the Website from time to time;
- To maintain records and provide Users with an efficient, safe and customized experience while using the Website;
- To use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the Website; (b) protect and defend our rights or property, the Website or our Users, and (c) act under emergency circumstances to protect the personal safety of us, our affiliates or the Users of the Website or the public. This includes exchanging information with other companies and organizations for fraud protection;
- We may use your Personal Information for purposes of KYC verification;
- We may send Users newsletters and e-mails to market other products and services we provide
- We may use Personal Information, including sensitive information of the Users to create non-identifiable “aggregate data”
- To analyse overall trends to help us improve the Website and services, including displaying detailed analytics to Users;
- Verify Users’ identity and prevent fraud or other unauthorized or illegal activity;
- To comply with applicable laws, rules, and regulations;

- And in any other way consistent with this Privacy Policy and to support the above activities.

Furthermore, you agree and provide your consent to Dexif and our partners, including but not limited to non-banking financial companies, KRAs, etc., to share, view and store information between each other for the limited purpose of (i) verification of details with respect to bank account etc for instituting efficient repayment mechanisms for the sellers; and (ii) updating your dashboard in accordance with this data.

Retention of Personal Information

We may retain Users' Personal Information as long as a User continues to use the Website or avail services, have an account with us, or for as long as is necessary to fulfil the purposes outlined in the Terms. Users can, either by reaching out to their Dexif representative in relation to the Website or services, or by sending an email to contact@dexif.in, request the Company to delete and destroy all such information.

We may, however, retain Personal Information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

Sharing and Transferring of Personal Information

1. We may disclose Personal Information about you to our representatives and other third parties to comply with applicable laws and regulations. We also reserve the right to disclose your Personal Information to third parties in an anonymous or aggregate form, to understand industry trends, patterns and add value and improve the quality of services imparted by us to You. We provide your Personal Information to our business partners, representatives and third-party processors to administer and process for the purposes notified to You in this Privacy Policy, and we may also share such details with third parties (such as auditors or legal advisors) to obtain professional advice. Any such processing will be governed by an agreement in the form required by law, preserving any and all of your statutory data protection rights. You authorize us to exchange, transfer, share, part with all or any of your Personal Information, across borders and from Your country to any other countries across the world with our affiliates/agents/third party service providers/partners/banks and financial institutions for the Purposes specified under this Privacy Policy or as may be required by applicable law.
2. You hereby consent and authorize us to publish feedback obtained by you on our Website.
3. User's financial information is transacted upon secure sites of approved payment gateways which are digitally under encryption, thereby providing the highest possible degree of care as per current technology. However, User is advised to exercise discretion while saving the payment details.

4. You acknowledge that Dexif may be obligated by law to disclose or transfer your Personal Information with Courts and Government agencies in certain instances such as for verification of identity, or for prevention, detection, investigation, prosecution, and punishment for offences, or in compliance with laws. You hereby consent to disclosure or transfer of your Personal Information in these instances.
5. Notwithstanding the above, we are not responsible for the confidentiality, security or distribution of your Personal Information by third-parties outside the scope of our agreement with such third-parties. Further, we will not be responsible for any breach of security or for any actions of any third-parties or events that are beyond the reasonable control of us including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service, etc.
6. We may share your information, including your Personal Information with our parent, subsidiaries and affiliates for internal reasons. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Website or applicable database; or (ii) in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our membership interests and/or assets or other corporate change, including, during the course of any due diligence process.
7. We may share your Personal Information with our other corporate and/or associate entities and affiliates to (i) help detect and prevent identity theft, fraud and other potentially illegal acts and cyber security incidents, and (ii) help and detect co-related/related or multiple accounts to prevent abuse of our services.
8. You agree and acknowledge that Dexif is a platform which has various products and services available for every user. Different products / services are / may be provided by a different service provider entity which may also be group companies of Dexif. Your KYC information and other details necessary for transacting in and/or use products or services on the Website shall be shared with the relevant service provider as may be required under law. For all purposes, your KYC on the Website shall enable you access to utilising any product or service on the Website, however, your data will not be shared with a service provider whose product or service you do not use on the Website.

Third Party Disclaimer

The Website may contain links to other websites. Please note that when Users click on one of these links, they are entering another website over which we have no control and for which we will bear no responsibility. Often these websites require the user to enter their Personal Information. We encourage and recommend the Users to read the privacy policies of all such websites as their policies may differ from our Privacy Policy. Users agree that we shall not be liable for any breach of privacy of Personal Information or loss incurred by their use of such websites or services. The inclusions or exclusions are not suggestive of any endorsement by the Dexif or contents of the website. Users may visit any third-party website

linked to the Website at their risk. Such third-party websites are governed by their own terms and conditions and when you access such third-party websites, you will be governed by the terms of such third-party websites.

Additionally, the Website may allow for certain content generated by the User, which can be accessed by other Users. Such Users are not authorized representatives or agents of the Company and their opinions or statements do not necessarily reflect those of the Company and we are not bound thereby to any contract to that effect. The Company expressly disclaims any liability arising out of any reliance on or misuse of such information that is made available by the Users.

Do we use Cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser, only if you allow, that enables the sites or service providers' systems to recognize your browser and capture and remember certain information.

We use cookies to understand and save your preferences for future visits, to advertise to you on other sites, and to compile aggregate data about traffic and interaction so that we can offer better site experiences and tools in the future.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you delete or decline cookies, some features of the Website may not work or may not work as designed. For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at www.allaboutcookies.org.

However, if you choose to disable cookies, you may be unable to access certain parts of our Website. A banner asking you to accept our cookies policy will be displayed upon the first visit to our Website (or the first visit after you delete your cookies). Unless you have adjusted your browser setting so that it will refuse cookies and/or you have not accepted our cookies policy, our system will issue cookies when you log on to our Website.

Users' Rights

Users may always opt-out of receiving future e-mail messages and newsletters from Dexif. To opt-out, Users can also send us a message at contact@dexif.in.

Notwithstanding anything contained above, if Users have given us consent to collect, store and/or process personal data, Users can request for their personal data to be deleted and/or withdraw consent at any time (without this affecting the legality of any data processing undertaken before the data was deleted or consent was withdrawn). In such a case, we will no longer be entitled to continue with the data processing in question (unless there is another legal basis for processing). If Users would like to request deletion and/or withdraw consent, Users can contact us via the contact details given in this Privacy Policy. Please indicate to what extent the User/s wish to delete their information or withdraw consent – i.e., whether for all data or data processing, or only certain kinds. [Additionally, Users may

nominate another individual to exercise their rights, appoint a consent manager, ask for a summary of their personal data stored with us, or exercise any other rights available to them under applicable laws, by writing to us at contact@dexif.in.

Who can use our services?

Our services can be used by adults and minors subject to the legal consent of their parent or legal guardian. If you have achieved the age of majority and intend to avail the services, or if you are the legal guardian of a minor intending to avail the services, i.e., any person below 18 (eighteen) years of age, you hereby agree and acknowledge that you have provided your informed and unconditional consent on behalf of yourself or on behalf of the minor (as applicable), in accordance with applicable laws.

Security

The security of your Personal Information is important to us. We have adopted reasonable security practices and procedures including role-based access, secure communication, password protection, encryption, etc. to ensure that the Personal Information collected is secure.

We restrict access to your Personal Information to us and our affiliates' employees, agents, third party service providers, partners, and agencies who need to know such Personal Information in relation to the Purposes as specified above in this Privacy Policy, provided that such entities agree to abide by this Privacy Policy.

We have also implemented information security practices and standards and have in place information security programmes and policies containing managerial, technical, operational and physical security measures that are in compliance with the applicable laws including, so as to protect the information provided to us from unauthorized access, use, modification, damage, disclosure or impairment. Further, We may from time to time use reasonable additional or alternative procedures to ensure the security and confidentiality of your Personal Information through our investment platform.

While we will endeavour to take all reasonable and appropriate steps to keep secure any information which we hold about you and prevent unauthorized access, you acknowledge that the internet is not 100% secure. No data transmission over the internet is fully secure, so we cannot ensure or warrant the security of any information you submit to us. Further, we do not guarantee in any way, the security of any information that you transmit or share on the Website; and you do so at your own risk.

If you think that the security of your account has been compromised, change your password and contact us immediately.

Changes To This Privacy Policy

We reserve the right to update (change, modify, add and/or delete) the terms of this Privacy Policy from time to time, at our sole discretion, to reflect company initiatives, changes in the

law or technology or changes in our practices regarding the collection and use of Personal Information.

When we update our Privacy Policy substantially, we will intimate you of the major amendments on your email address registered with us or on the Website. If you do not agree to the amendments, please do not use the Website or services any further. By continuing to use the Website, you will be deemed to have consented to the latest version of the Privacy Policy.

This document is an electronic record in terms of Information Technology Act, 2000 and rules made there under as applicable and the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures.

Contact

Please direct any queries and requests relating to our use of information or this Privacy Policy to us by an email to contact@dexif.in.

The Digital Personal Data Protection Act, 2023 provides individuals right to raise complaints with us, as well as the Data Protection Board. However, please note that registering of false or frivolous complaints with the Data Protection Board is a punishable offence.

Compliance with Law

This Privacy Policy is governed by all laws applicable within the territory of India. By using our Website and services, Users are agreeing to the terms of the Privacy Policy thereby consenting to the exclusive jurisdiction and venue of courts in New Delhi, India, in all disputes arising out of or relating to the use of the Website or the Privacy Policy.

Some of our services allow you to upload, submit, store, send or receive content. When you upload, submit, store, publish, send or receive content to or through our services, you provide us with your consent to utilise such content, including for our marketing purposes, subject to our Privacy Policy.

Such content must not:

1. Be harmful, harassing, blasphemous, defamatory, obscene, pornographic, paedophilic, libellous, invasive of another's privacy, hateful or racially or ethnically objectionable, disparaging, and relating to, or encouraging money laundering or gambling.
2. Harm minors in any way.
3. Infringe any patent, trademark, copyright or other intellectual property rights.
4. Deceive or mislead the reader about the origin of such messages or communicate any information that is grossly offensive or menacing in nature.
5. Contain software viruses or any other programs designed to interrupt, destroy or limit the functionality of another computer or mobile device.

6. Threaten the unity, integrity, defence, security or sovereignty of India, friendly relations with foreign states, or public order.
7. Cause the incitement to commit any offence or prevent the investigation of any offence.
8. Be insulting to any other nation.
9. Impersonate another person.
10. Violate the provisions of the Information Technology Act, 2000 and rules and regulations thereunder or any other applicable laws.

Grievance Officer

If Users have any questions or concerns/ grievances at all about our Privacy Policy, please contact us at:

Name: Kiran PK

Designation: Full-stack Engineer

Address: 19th Floor, 19A106 Berger Delhi One, Section 16B, Noida, Uttar Pradesh - 201301.

Email: contact@dexif.in