



**Finvasia Financial Services Pvt. Ltd**

**Privacy Policy**

## **STATEMENT ON PRIVACY AND SECURITY**

Welcome to Finvasia Financial Services Private Limited. The domain name [www.ffspl.com](http://www.ffspl.com) (hereinafter referred to as "Website") is owned by FFSPL, a company incorporated under the Companies Act, 1956, having its Corporate Office at 1108, Sector 21-B, Chandigarh, 160022 (hereinafter to be referred as "FFSPL"). For the purpose of this Privacy Policy, wherever the context so requires the term "You" or "User" shall mean any natural or legal person including online and offline clients and the term "We", "Us", "Our" shall mean FFSPL.

By registering for or using the site, you signify your acceptance of this privacy statement. If you do not agree to this privacy statement, you cannot use the site. We reserve the right to modify this Statement at any time by posting a notice on the Site's home page. (If we consider it appropriate, we may also provide additional notice of significant changes.) Your use of the Site after the date of the last modification listed at the beginning of this Privacy Statement indicates to us that you agree to the changes.

This Privacy Statement applies to your use of this Site only. At FFSPL we are strongly committed to protecting the personal and financial information that you submit to us. This information is provided when you register to receive certain financial services or products from FFSPL. The personal information we get from you will help us provide you with improved services and products that match your needs as closely as possible.

### **Collection of Sensitive Personal Data or Information:**

FFSPL may, for the purpose of rendering its services, collect personal information such as:

- Name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information;
- PAN, KYC Status, Signature and Photograph;
- Bank account or other payment instrument details; or any other detail for providing services.

FFSPL offers online platform System for availing financial products & services that require such personal data or information to process your financial and non-financial transaction requests. The information so collected may be shared with RBI, FIU-IND, Central KYC Registry, CERSAI, CICs, and NeSL etc. solely for the purpose of processing your transaction requests or serving you better.

Under certain circumstances we may be required to share the information given by you with the third parties, where we feel they can contribute to add value and improve the quality of services imparted by us to you. We shall take all reasonable steps to ensure that the confidentiality of your information is maintained by imposing strict confidentiality standards on all the third parties with whom we part this information. In all circumstances we shall ensure that your personal information is protected by strict confidentiality agreement. We shall not allow any third parties to retain your personal information longer than what is warranted by the nature of services rendered. We would also impart your personal information wherever it is required to be disclosed under law to any of the governmental agencies or regulatory bodies. By agreeing to avail the service offered by FFSPL you have agreed to the collection and use of your Sensitive Personal Data or Information by FFSPL. You always have the right to refuse or withdraw your consent to share/dissemination of your Sensitive Personal Data or Information by contacting the customer care. However, in such an event, you would no longer avail the services of FFSPL.

We shall not sell your personal information to any third party. However under certain conditions we would share this information:

- We share information as part of normal business operations, such as providing you with any services to which you subscribe, and any activity related to these services such as collecting fees for those services, and informing you about these services; as part of normal legal/regulatory purposes required by regulatory and government entities,
- And we may occasionally invite selected third parties to participate in offers we feel would be attractive to customers of FFSPL.

It may become necessary for FFSPL to disclose your personal information to our agents and contractors, or to their subcontractors. However these parties would be required to use the information obtained from FFSPL for such use exclusively. Your account information is protected by placing it in the secure portion of our website, which is why you need to enter your unique login username and password each time you want to access your account information.

Do help us protect your privacy by maintaining the secrecy of the username and password you use for any of our services.

Please note that this privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so. We, at FFSPL, acknowledge and accept that the personal details that you impart to us, is to be kept in strict confidentiality and to use the information only in the manner which would be beneficial to our customers. We consider our relationship with you as invaluable and strive to respect and safeguard your right to privacy. We shall protect the personal details received from you with the same degree of care, but no less than a reasonable degree of care, to prevent the unauthorized use, dissemination, or publication of this information as we protect our own confidential information of a like nature. We shall use the personal information to improve our service to you and to keep you updated about our new product or information that may be of interest to you. The information collected from you would be used in the right spirit and context in which it is intended to be used. Your information would be used by us to process your trading request for availing our products & services.

We understand clearly that You and Your Personal Information is one of our most important assets. We store and process Your Information including any sensitive financial information collected (as defined under the Information Technology Act, 2000), if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures in accordance with Information Technology Act 2000 and Rules there under. If you object to Your Information being transferred or used in this way, please do not provide the details of your information on the Website.

To ensure security of access to the personal information and transaction details, the access to the secured zone of our website is restricted by the unique login ID and Password selected by you. You should be very careful in handling the ID and password and you should ensure that you do not reveal it to anybody, nor do you keep it in writing. You should keep changing your password periodically. We and our affiliates will share/sell/transfer/license/convey some or all of your personal information with another business entity to carry out any business activity or re-organization, amalgamation, restructuring of business or for any other reason whatsoever. Once you provide your information to us, you provide such information to us and our affiliate and we and our affiliate may use such information to provide you various services with respect to your transaction conducted on [www.ffspl.com](http://www.ffspl.com).

When You use the Website or send emails or other data, information or communication to us, You agree and understand that You are communicating with Us through electronic records and You

consent to receive communications via electronic records from Us periodically and as and when required. We may communicate with you by email or by such other mode of communication, electronic or otherwise.

Additional Privacy Policy for applicable subjects as per European General Data Protection Regulation This section is applicable to subjects as per the requirements of the European General Data Protection Regulation (“GDPR”) which comes into effect on May 25, 2018. This section is to be read in addition to the Privacy Policy, Terms of Use and any other Agreement entered into with FFSPL by all visitors to the website and clients using the services of the company.

FFSPL handles two categories of data as mentioned above in this Privacy Policy, i.e. (1) Personal Information and (2) Non Personal Information. As per this Policy, FFSPL shall have a right to use and disclose data obtained from all users/subjects in connection with visiting websites, support and/or use of the services of FFSPL.

All users subjected to the GDPR guidelines agree to provide consent to this Policy. All users subjected to the GDPR, after giving written notice of stopping to use the services provided by FFSPL, shall have the right to erase or correct such (1) Personal Information OR (2) Non Personal Information as processed by FFSPL.

After giving a written notice, a user, who is subject to GDPR, shall have the right to receive Personal Information and Non Personal Information, which is provided to FFSPL during the usage of company’s services, such that, this information may be used by another entity which is technically feasible by all parties to the maximum extent possible.

For sending across any notice pertaining to removal or requesting to receive all such Personal Information and Non Personal Information, such that, this information may be transferred to another entity/controller of such data as per the GDPR, all subjected users are required to write to [complaint@ffspl.com](mailto:complaint@ffspl.com).

### **Cookies and Tracking Technology:**

A cookie is a small data file that certain Web sites write to your hard drive when you visit them. Cookies cannot be used to run programs or deliver viruses to your computer. A cookie file can contain information such as a user ID that the site uses to track the pages you've visited, but the only personal information a cookie can contain is information you supply yourself. A cookie can't read data off your hard disk or read cookie files created by other sites. Cookies save your time, for

example, if you personalize a web page, or navigate within a Site; a cookie recalls your specific information on subsequent visits. www.ffspl.com also uses cookies to track user traffic patterns. We do this in order to determine the usefulness of our website information to our users and to see how effective our navigational structure is in helping users reach that information. You may accept or decline cookies. Most web browsers automatically accept cookies; however you can modify your browser setting to decline cookies. In addition to cookies, our site uses a variety of technical methods for tracking purposes, which may include web beacons. Web beacons are small pieces of data that are embedded in images on the pages of web sites. www.ffspl.com also uses these technical methods to analyze the traffic patterns on our web site, such as the frequency with which our users visit various parts of our web site.

### **Disclaimer as to Loss:**

Although, we take appropriate steps to maintain the security of Personal Information we collect from you. But you must understand that the open nature of the Internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. FFSPL assumes no responsibility of whatsoever nature as to make good the losses and damages you may incur, due to privacy and/or security breach of your Personal Information.

### **Subject to Change**

This Privacy Policy is subject to change and may be updated or revised from time to time, without any prior notification to the User, at the sole discretion of FFSPL. It is the responsibility of the User to periodically review the Privacy Policy to determine whether there have been any revisions or updates. The last updated date of the Policy has been mentioned above for the reference of the User.

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