

KALEIDOFIN PRIVACY POLICY

Last Updated on Date: June 18, 2019

This Privacy Policy (“**Privacy Policy**”) is incorporated into and subject to the Master Services Agreement. All capitalized terms for which definitions have not been provided for in this Privacy Policy shall have the meaning ascribed to them in the Master Services Agreement.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. THIS PRIVACY POLICY DESCRIBES THE WAY KALEIDOFIN OR ITS AFFILIATES (“WE”, “US” OUR”) COLLECT, STORE, SECURE AND USE YOUR PERSONAL INFORMATION. THROUGHOUT THIS PRIVACY POLICY, “YOU” REFERS TO THE CLIENT. YOU ACCEPT THIS PRIVACY POLICY BY VISITING OUR WEBSITE AND/OR THROUGH AVAILING ANY OF OUR SERVICES UNDER THE MASTER SERVICES AGREEMENT.

For the purposes of this Privacy Policy, “**Personal Information**” shall mean any information that identifies or can be used to identify, contact or locate the person, to whom such information pertains, including, but not limited to, name, address, date of birth, phone number, fax number, email address, PAN, Aadhaar number, driving license/ passport/ voter identity card/ government issued identification card, financial profiles like the name of your employer, monthly salary, annual income, net worth, credit/ debit card details, details of your assets and liabilities, copies of identification documents, e-KYC, demographic information, photographs, biometric information, digital signature keys, bank account, card information and other personal information.

We are committed to keeping your Personal Information confidential and will only give it to others for the purposes set out in this Privacy Policy.

Our Privacy Policy is regularly reviewed to make sure that we continue to serve your privacy interests. We reserve the right to update this Privacy Policy and these changes will be posted on our website. We will notify you of any changes to this Privacy Policy. The date of last revision appears at the top and all changes take effect immediately upon posting.

1. Collection and Use of Personal Information

- 1.1. When you use the Website, we collect and store the Personal Information provided by you from time to time, in compliance with applicable laws. The primary aim in doing so is to provide you with a safe, efficient, and customized experience while using the Website and to verify your identity and other information that you provide.
- 1.2. If you opt to open an account on the Website or use our Service, you will be required to supply your Personal Information. Before permitting you to use the Services, we may require you to provide additional information, including but not limited to your date of birth, PAN, personal information stored with third parties such as social media sites (such as Facebook or Twitter) and other personal information. We may use this information to verify your identity or other information you provide.
- 1.3. We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses first-party cookies to report on user interactions with our web-based services. These cookies store non-personally identifiable information. Google Analytics aggregates technical data (non-personally identifiable data relating to your usage of our website) with data collected from our other users. We use this information to identify the most popular areas of the Services and how to best present and customise them. We may use the unique identifier of your device for security purposes to track suspicious activity. For instance, if we detect that your Kaleidofin Investment Account is being accessed from multiple devices, we may contact you to ensure that you have authorized such access. Under no circumstance will your email address, password and any financial data be collected by or shared with Google Analytics.

- 1.4. For more information about how Google handles technical information, please visit the site, "How Google uses data when you use our partners' sites or apps", (located at: www.google.com/policies/privacy/partners).
- 1.5. We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (such as PIN code, age, or income level). We use this data to customize your experience on the Website, providing you with content that we think you might be interested in and by displaying content according to your preferences.
- 1.6. We also collect information about you from third parties such as credit bureaus and other identity verification and fraud prevention services. This information we collect from such third-party sources is governed by your privacy policies agreed with those sources and with your express consent. By providing such third-party information by way of authorizing us to access such information, you agree that we may collect, store, process and share such information in accordance with this Privacy Policy.
- 1.7. By providing your email and phone number to us, you are authorizing us, our representatives and our partners to communicate with you through various modes like call, email to offer you our Services or the Solution opted by you, marketing material about solutions, promotional offers offered by our partners. Irrespective of the fact that you have registered yourself under Do Not Disturb ("DND") or Do Not Call ("DNC") service, you are still authorizing us, our representatives & our partners to communicate with you for the above mentioned purposes. There is no DNC check required for a number you leave on our website or with our agents. If you wish to opt-out receiving such communication from us you can do so by sending us an e-mail at 121@kaleidofin.com.
- 1.8. If you send us personal correspondences, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Website, we may collect such information into a file specific to you.
- 1.9. If you telephone us we may also record and/or monitor calls for quality checks and staff training. Such recordings may also be used to help us combat fraud.
- 1.10. In the event that you want to review and/or update your information as provided to us, or obtain a copy of the same, please write to us at 121@kaleidofin.com.

2. Sharing of Personal Information

- 2.1. We will keep your Personal Information confidential and only share it with others for the purposes explained in this Privacy Policy. We have trusted relationships with carefully selected banking and financial entities (to whom we provide service) or other third parties (who perform services on our behalf), some of which may be located within or outside of India. Examples of service providers we use are payment processors, email service providers and providers of hosting services. All service providers are required to maintain the security of your Personal Information and to use it only as permitted by us and they must comply with the security practices and procedures as maintained by us as set out in this Privacy Policy.
- 2.2. Disclosure of Information. Under no circumstance will we sell or rent your Personal Information to anyone, for any reason, at any time. Just like any other financial services company, we use authorized third party service providers who are bound by the same standards of data security practices and procedures as we are under law and contract. They are subject to the same penalties as we are for the unauthorised disclosure of your personal information. However, under Indian law, Kaleidofin remains liable to you, our customer, for any unauthorised disclosure of your sensitive personal information.
- 2.3. We may share your Personal Information:
 - (a) to transfer data, personal information etc. with any banking or financial entity or third party firm.

- (b) to analyze usage of the website or to improve the Service as provided by us.
- (c) to send communications relevant to your use of Service or Solution as offered by us.
- (d) to enable you to apply for your chosen Solutions.
- (e) in relation to research, to effectively control against error, fraud or other criminal activity.
- (f) to enforce our terms of use.
- (g) to any person who has told us and who we reasonably believe to be your parent, carer or helper where you are unable to handle your own affairs because of mental capacity or other similar issues.
- (h) to any person to whom we sell or transfer (or enter into negotiations to sell or transfer) or with whom we merge our business or any of our rights or obligations under any agreement we may have with you. If the merger, transfer or sale consummates, the transferee or purchaser may use your Personal Information in the same way as us.
- (i) to regulators, ombudsmen or other authorities, including tax authorities, including those overseas, where we are requested by them to do so.

2.4. The Personal Information shared by you shall be used to perform background checks on your identity and your fitness to avail the Services offered by us on the Website.

3. Security Precautions

3.1. Security measures (physical, electronic and managerial) are in place to protect you against the loss, misuse, and alteration of the Personal Information under our control. We store Personal Information in encrypted form on computers and control access via secure web pages. We employ firewalls and other security technologies to protect our servers from external attack. Access to the Website's server is restricted to authorized personnel and shared with employees strictly on a 'need to know basis'. We shall also promptly notify you if any security breach is made known to us in relation to unauthorized access to your Personal Information.

3.2. Our security systems meet or exceed industry standards and we are constantly monitoring internet developments to ensure our systems evolve as required. However, while we strive to use commercially acceptable means to protect your Personal Information, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, by using this Website, you agree that we will have no liability for disclosure of your Personal Information due to errors in transmission, infrastructure failures by us or any intermediary (including telecom and internet service providers), or unauthorized acts of third parties.

4. Opting Out

4.1. We will generally retain your Personal Information for as long as needed to provide you with details of our Solutions and Services. If you change your mind, and don't wish to remain on our contact list, just let us know at 121@kaleidofin.in

4.2. As part of the application process, we ask you whether we may contact you about our solutions and services by telephone, post, email and SMS (or other reasonable method). If you ticked "yes" but no longer wish to receive such communications, please contact us on 121@kaleidofin.in.

4.3. You have the right to withdraw your consent to our use of your Personal Information at any time where we rely on your consent to use or process that information by sending an email to 121@kaleidofin.in. In such case, Kaleidofin will unfortunately not be in a position to provide the Services to you.

5. Grievance Officer

- 5.1. In accordance with the Information Technology Act, 2000 and the rules made thereunder, the name and contact details of the Grievance Officer are provided below in the event you have any questions or complaints regarding our Privacy Policy or practices:

Madhukar Choudhary

madhukar@kaleidofin.com, +917358071412

Email: 121@kaleidofin.com

We are committed to providing a first response within 24 hours of receiving the complaint, and we aim to resolve all complaints within 3 (three) business days. Any delay in the resolution time shall be proactively communicated to you. If you do not hear back from us within a week's time, please do write to us at grievance@kaleidofin.com for escalation of your specific complaint to the relevant grievance redressal officer.

6. Our Legal Obligations

- 6.1. This Privacy Policy is published on the website in compliance with Regulation 4 of the (Indian) Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.
- 6.2. We are bound by the (Indian) Information Technology Act, 2000, and comply with all its provisions available at <http://deity.gov.in/content/it-act-2000-dpl-cyber-laws>. Under Section 43A of the (Indian) Information Technology Act, 2000, kaleidofin.com and all its service providers are obliged to maintain reasonable security procedures to safeguard your Personal Information. Should there be any accidental disclosure of your Personal Information, you have the right to claim compensation from us.
- 6.3. Under Regulation 5 of the Information Technology (Reasonable Security and Procedures and Sensitive Personal Data or Information) Rules, 2011, we are obliged to provide every Kaleidofin Investment Account holder with a readable copy of the Personal Information you have provided us. If you would like a copy, do get in touch with us at 121@kaleidofin.com.