

## PRIVACY POLICY

Carepal Fintech Private Limited (“**Carepal**”/ “**Company**”/ “**Us**” / “**We**” / “**Our**”) respects your privacy and is committed to protecting Your Personal Information ( defined hereunder). This privacy policy (“**Privacy Policy**”) will describes as to how We protect your Personal Information (as defined below) when You visit Our Website (as defined below).

Carepal has adopted this Privacy Policy to inform You of what information We collect from You through the Website, how We collect the information, how We may use it and the steps We take to protect it. For the purposes of this Privacy Policy, any information that uniquely identifies you (“**User**” / “**You**” / “**Your**”) such as Your name, address, contact number or email address, is referred to as (“**Personal Information**”). We lay great emphasis on Our privacy and security standards to guard against identity theft and provide security for Your Personal Information. We regularly re-evaluate Our privacy and security policies and adapt them as necessary to respond to new challenges.

This Privacy Policy applies to [www.carepalmoney.com](http://www.carepalmoney.com) (“**Website**”) and all other applications, online services, and other interactive features or downloads that post a link to this Privacy Policy, whether accessed via computer, mobile device, or otherwise. The Website is owned and controlled by Carepal. This Privacy Policy only covers information collected at the Website. This Privacy Policy may apply to the information that Company collects offline, but only if specifically stated at the time of collection or if the information is combined in Our databases. Please review this Privacy Policy carefully.. In addition, please review Our Terms & Conditions(hereinafter defined below), which governs Your use of the Website. This Privacy Policy is incorporated into and subject to the Terms & Conditions. By visiting the Website, Y agree to be bound by the terms of this Privacy Policy. If You do not agree please do not use or access the Website and immediately close this page. We fully describe Our privacy practices below in this Privacy Policy.

THIS OVERVIEW HIGHLIGHTS SOME IMPORTANT INFORMATION REGARDING THIRD PARTY ADVERTISERS AND ANALYTICS PROVIDERS, AND OUR USE AND SHARING OF YOUR PERSONAL INFORMATION, BUT PLEASE REVIEW OUR FULL PRIVACY POLICY BEFORE USING OUR WEBSITE.

We primarily use the information We collect when You interact with the Website in connection with Your relationship with Carepal, Your use of the Website, and for sending You information from Us or on behalf of third parties. Please review the “Collection Of Personal Information, Other Information And Its Usage” and “How We Use Your Information and For What Purposes” sections for a full description of the information We collect and how We use that information. Note that We do not share Your Personal Information with third parties for their marketing purposes without Your consent; however, We may share Your Personal Information under certain limited circumstances. For more information, please review the section below entitled “How We Share Your Personal Information .”

The Website may contain content served by third parties, including videos and advertisements, and We work with third-party service providers to serve the advertisements elsewhere online. In connection with serving content and providing analytics and advertising services, third parties may collect certain information about Your visits to this or other websites and We may receive information regarding the use of the Website and the effectiveness of Our advertisements. We do not share Personal Information with these third parties, but the

advertising networks, advertisers, ad agencies, analytics service providers, and other vendors may set and access their own tracking devices (including Cookies and Web beacons) and they may otherwise collect or have access to Personal Information about You (such as Your general interest in certain book genres).

This Privacy Policy is published in accordance with the provisions of the Indian Information Technology Act, 2000, and the rules made thereunder, specifically, The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal data or information) Rules, 2011, and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

Personal Information for the purposes of this Privacy Policy shall include, but not be limited to, information regarding Your name, photograph, address, telephone number, date of birth, gender, e-mail address, financial information details, Facebook profile, contacts, etc.

**BY VISITING THIS WEBSITE, YOU AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE PLEASE DO NOT USE OR ACCESS OUR WEBSITE.**

## **1. COLLECTION OF PERSONAL INFORMATION, OTHER INFORMATION AND ITS USAGE**

- 1.1** This Privacy Policy explains the nature of personal and non-personal information that the Website collects or receives and the manner in which it possesses, stores, deals or handles such personal and non-personal information.
- 1.2** Where possible, We indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the Website. We may automatically track certain information about You based upon Your behaviour on Our Website.
- 1.3** We use data collection devices such as **Cookies**” or **Web Beacons** on certain pages of the Website to help analyze Our web page flow, measure promotional effectiveness, and promote trust and safety. **"Cookies"** are files placed on Your hard drive that assist Us in providing Our services. We offer certain features that are only available through the use of a "Cookie". We also use Cookies to allow You to enter Your password less frequently during a session. Cookies or Web Beacons can also help Us provide information that is targeted to Your interests, tell Us which parts of Our Website You have visited, and facilitate and measure the effectiveness of advertisements and web searches.
- 1.4** The Personal Information as collected will be retained by Carepal in compliance of the applicable laws.
- 1.5** Personal Information for the purposes of this Policy shall include, but shall not be limited to the following:
  - 1.5.1. Identity and profile-related data:** This includes Your first and last name, parents’ name, date of birth, gender, photographs, educational qualifications and background, purpose of loan, employment status, company name, and

marital status, etc.

- 1.5.2. **Contact data:** This includes Your email addresses (including work email address), in code, phone numbers, and office and residential address.
- 1.5.3. **KYC data:** This includes identification documents issued by the government or other authorities, and includes details of or pertaining to Your Aadhaar, PAN card, voter ID, etc.
- 1.5.4. **Transaction data:** This includes details of transactions that may occur through the Platform or in connection with the services. For example, transaction data may include the services You have sought or availed through the Website or confirmations of such services.
- 1.5.5. **Data from SMSs:** We collect certain information from Your SMSs. Please note that such data is limited to details of the transactions contained in the SMS. We do not collect, read or store any personal SMSs.
- 1.5.6. **Financial data:** This includes Your income details, details of loans issued or otherwise applied for through the Website, payments, and repayments thereof, bank account details, and bank account statements.
- 1.5.7. **Marketing and communications data:** This includes Your preferences in receiving marketing messages from Us and Our third parties and Your communication preferences.
- 1.5.8. **Device data:** This includes Your IP addresses, locations, operating systems, and device information.
- 1.5.9. **Usage data:** This includes information about how You use the services offered by Carepal.

**1.6** We do not collect any special categories of Your Personal Information (this includes details about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data), nor do We collect any information about criminal convictions and offenses related to You.

**1.7** We further do not access Your mobile phone resources such as files and media (except as disclosed above in order to enable You to upload documents), contact list, call logs and telephony functions. However, We may access Your camera, microphone, location, or any other facility solely for the purpose of KYC checks, after obtaining Your explicit consent. We do not collect Your biometric data.

**1.8** If You fail to provide Us the Personal Information, We would not be able to provide You with parts or the entire service offered by Carepal and its Website.

## **2. HOW WE COLLECT THIS PERSONAL INFORMATION**

**2.1** We use various methods to collect and process Personal Information from and about You including through:

- 2.1.1. **Personal Information You provide us:** This is the Personal Information (including identity, contact, KYC, financial, and device data) You consent to give Us when You use Our services or when You correspond with Us (for example, by email or chat, or through the Website). It includes information You provide when You register to use the services, use the Website feature, share data through the Website, or when You report a problem with the Website and

Our services. If You contact Us, We will keep a record of the information shared during the correspondence.

2.1.2. **Personal Information We collect about You and Your device:** Each time You visit the Website or use the services, We will automatically collect Personal Information through the use of tools like cookies.

2.1.3. **Personal Information We receive from other sources including third parties and publicly available sources:** We may receive Personal Information about You from various third parties and public sources including Our third parties, Google analytics for advertising and user analytics purposes, and other publicly available sources.

2.2 Please note that We do not have any control over Personal Information that You may choose to make publicly available. For example, if You post reviews, comments, or messages on public sections, You do so at Your own risk. We are not liable for third-party misuse of such data.

### **3. USE OF DEMOGRAPHIC / PROFILE DATA / YOUR PERSONAL INFORMATION**

We use Personal Information to provide the services You request. To the extent We use Your Personal Information to market to You, We will provide You the ability to opt out of such uses. We use Your Personal Information to resolve disputes; troubleshoot problems; help promote a safe service; measure consumer interest in Our products and services, inform You about online and offline offers, products, services, and updates; customize Your experience; detect and protect Us against error, fraud, and other criminal activity; enforce Our Terms & Conditions; and as otherwise described to You at the time of collection. In Our efforts to continually improve Our product and service offerings, We collect and analyze demographic and profile data about Our users' activity on Our Website.

### **4. HOW WE USE YOUR PERSONAL INFORMATION AND FOR WHAT PURPOSES**

4.1 We will only use Your Personal Information in accordance with the applicable law. Most commonly, We will use Your Personal Information to provide You with the services, or where We need to comply with a legal obligation.

4.2 You agree and acknowledge that by using Our Website and services, and by creating an account on the Website, You authorise Us, Our associate partners, and affiliates to contact You via email, phone, or otherwise. This is to ensure that You are aware of all the features of the services offered on the Website.

4.3 In general, We use Your Personal Information for the following purposes and activities undertaken without direct human supervision or control:

4.3.1. To register You as a user of the Website;

4.3.2. To provide You with the services;

4.3.3. To facilitate Your application to avail loan and otherwise in connection with Your obtaining of credit facilities from RBI regulated entities i.e. Our lending partners

- 4.3.4. To manage Our relationship with You, including notifying You of changes to any services;
- 4.3.5. To administer and protect Our business and the Website, including troubleshooting, data analysis, system testing, and performing internal operations;
- 4.3.6. To deliver content to You;
- 4.3.7. To send You communication, in relation to Your use of the Website or services;
- 4.3.8. To monitor trends so We can improve the Website and services;
- 4.3.9. To improve Our business and delivery models;
- 4.3.10. To perform Our obligations that arise out of the arrangement We are about to enter or have entered with You;
- 4.3.11. To enforce Our Terms & Conditions;
- 4.3.12. To undertake marketing services, including sending You promotional messages;
- 4.3.13. To respond to court orders, establish or exercise Our legal rights, or defend ourselves against legal claims;
- 4.3.14. In compliance with the RBI's norms, to contact You or locate You in case of any default; and
- 4.3.15. To ensure compliance with applicable laws.

## **5. HOW WE SHARE YOUR PERSONAL INFORMATION**

- 5.1** You agree and acknowledge that any and all Personal Information pertaining to You, whether or not You directly provide it to Us (via the services or otherwise), including but not limited to personal correspondence such as emails, instructions from You, etc., may be collected, compiled, and shared by Us with third parties after obtaining Your explicit consent, solely in order to render the services to You (that is, in connection with loan applications and Your loan journey). This may include but not be limited to Lenders (as defined in the Terms & Conditions), storage providers, data analytics providers, consultants, lawyers, and auditors. We may also share this Personal Information with Our affiliates and subsidiaries in connection with the above mentioned purposes. If You fail to provide consent for sharing of such Personal information when requested by Us, We may not be able to perform Our obligations under the arrangement We have with You or are trying to enter into with You. In this case, We may not be able to provide the services to You.
- 5.2** You agree and acknowledge that by using Our Website and services and creating an account on the Website, You authorize Us to contact You via email, phone, or otherwise. This is to ensure that You are aware of all the features of the Website.
- 5.3** You agree and acknowledge that We may share Personal Information where We are required by law, any court, a government agency, or authority to disclose such Personal Information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Privacy Policy or the Terms & Conditions, or in order to comply with any applicable laws and regulations.
- 5.4** You agree and acknowledge that Personal Information may be shared with such third parties as are required for: (a) the purposes of providing You with the services on the Website, and may be subject to the practices of such third parties; or (b) facilitating subscription for Carepal content and services on the Website by You; or (c) to grow

Our business which may include Our affiliates, strategic partners, investors, suppliers and service providers, as the case maybe.

Except as provided in paragraph above, We shall disclose the Personal information only in circumstances where:

- (i) You have provided instructions or consent towards such disclosure;
- (ii) We, in good faith, believe that access, use, preservation or disclosure of such information is reasonably necessary to: (a) satisfy any applicable law, regulation, legal process or enforceable governmental or regulatory request; (b) enforce the applicable User agreement or Privacy Policy; (c) detect, prevent, prohibit or otherwise address fraud, security or technical issues, (d) enforce Our rights against You or in connection with a breach by You of this Privacy Policy; or (e) protect against imminent harm to the rights, property or safety of Carepal, its Users or the public as required or permitted by law; and
- (iii) If We sell or transfer any of Our business or assets, certain Personal Information may be a part of that sale or transfer.

## **6. ACCESS AND UPDATING YOUR PERSONAL INFORMATION**

You hereby warrant that all Personal Information that You provide Us with is accurate, up-to-date, and true. When You use Our Website and the services offered by Us, We make best efforts to provide You with the ability to review and correct inaccurate or deficient data, subject to any legal requirements. We shall verify the accuracy of the new Personal Information You provided to Us.

## **7. CONSENT**

By using the Website and/ or by providing Your Personal Information, You consent to the collection and use of the Personal Information You disclose on the Website in accordance with this Privacy Policy, including but not limited to Your consent for sharing Your Personal Information as per this Privacy Policy. 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.

## **8. PROHIBITED ACTIONS**

8.1. While using this Website, You agree not to, by any means (including hacking, cracking, or defacing any portion of the Website) indulge in illegal or unauthorized activities including the following:

- 8.1.1. Restrict or inhibit any authorized user from using this Website
- 8.1.2. Use the Website for unlawful purposes
- 8.1.3. Harvest or collect information about Website users without their express consent
- 8.1.4. "Frame" or "mirror" any part of the Website without Our prior authorization
- 8.1.5. Engage in spamming or flooding
- 8.1.6. Transmit any software or other materials that contain any virus, time bomb, or other harmful or disruptive components
- 8.1.7. Remove any copyright, trademark, or other proprietary rights notices contained in the Website

- 8.1.8. Use any device, application, or process to retrieve, index, "data mine" or in any way reproduce or circumvent the navigational structure or presentation of the Website
- 8.1.9. Permit or help anyone without access to the Website to use the Website through Your username and password or otherwise

## **9. SECURITY**

- 9.1** We intend 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 Personal Information from unauthorized access, use and disclosure.
- 9.2** Our Website has stringent security measures in place to protect the loss, misuse and alteration of the Personal Information under control. We endeavour to safeguard and ensure the security of the Personal Information provided by You.
- 9.3** We aim to protect from unauthorized access, alteration, disclosure or destruction of Personal Information We hold, including:
  - (i) We offer security features like an OTP verification to help You protect Your account;
  - (ii) We restrict access to Personal Information to Our employees, contractors, and agents who need that Personal Information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
  - (iii) We regularly review this Privacy Policy and make sure that We process Your Personal Information in ways that comply with it.
- 9.4** While We will endeavor to take all reasonable and appropriate steps to keep secure any Personal Information which We hold about You and prevent unauthorized access, You acknowledge that the internet is not 100% secure and that We cannot provide any absolute assurance regarding the security of Your Personal Information. We will not be liable in any way in relation to any breach of security or unintended loss or disclosure of Personal Information caused by Us in relation to Your Personal Information.
- 9.5** Notwithstanding anything contained in this Privacy Policy or elsewhere, We shall not be held responsible for any loss, damage or misuse of Your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event.
- 9.6** "Force Majeure Event" shall mean any event that is beyond the reasonable control of us and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorized access to computer, computer system or computer network, computer crashes, breach of security and encryption (provided beyond reasonable control of us), power or electricity failure

or unavailability of adequate power or electricity.

- 9.7** We do not warrant that Our Website or any electronic communication made by Us is free from virus or other harmful effects. In the event of any errors in transmission or due to an act of a third party, We shall have no liability. You explicitly agree that Your use of the Website and/or services provided by Us is at Your own individual risk. You agree and confirm that Your Personal Information may be transferred, processed and stored. You hereby confirm that You have been made aware of the security measures undertaken by Us and You expressly consent to Us storing, handling, using Your Personal Information.

## **10. YOUR LEGAL RIGHTS**

**10.1** Under certain circumstances, You have the right to:

10.1.1 Request the erasure of Your Personal Information: This enables You to ask Us to delete or remove Personal Information . We shall comply with any request, subject to applicable laws and the terms of the loans that are sanctioned through the Website.

10.1.2 Right to deny consent: This enables You to deny Us the consent necessary to process Your Personal Information . If You exercise this right, it may impact or restrict Our ability to provide services to You.

10.1.3 Right to revoke consent: This enables You to withdraw consent at any time. We shall comply with any request, subject to applicable laws and the terms of the loans that are sanctioned through the Website.

10.1.4 Right to Opt-Out:

You may opt out of receiving Our marketing and update emails. To stop receiving Our promotional emails, please email [contact@carepalmoney.com](mailto:contact@carepalmoney.com). It may take about 7 (seven) working days to process your request.

**10.2** You have a legal right to a copy of any information about You held by Us. You also have a right to correct any errors in that Information. As mentioned above, You have a right to request that We cease to use Your Personal Information for direct marketing purposes.

**10.3** You have a right to obtain and request update of identity information stored with Us including authentication logs, but cannot request for core biometric information.

**10.4** We will facilitate Your request to exercise such rights subject to the provisions of applicable laws relating to the processing and storage of data. If You wish to exercise any of the rights set out above, please write an email to the Grievance Officer, whose details are mentioned in Section 15 (“**Grievance Officer**”) of this Privacy Policy, providing in as much detail as possible, the right(s) You wish to exercise. Please also include a description of the Personal Information You believe We hold or process about You, so that We may be able to locate such Personal Information. In the event that We need additional information from You, Our Grievance Officer will contact You.

**10.5** We will be able to reply to Your request(s) within thirty (30) days of raising the request. In the event that We are not able to respond to or acknowledge Your request within thirty (30) days of receipt due to any reason, We will inform You.



## **11. LINK TO THIRD PARTY WEBSITE**

- 11.1** Links to third-party advertisements, third-party website or any third party electronic communication service may be provided on the Website which are operated by third parties and are not controlled by, or affiliated to, or associated with, Us unless expressly specified on the Website.
- 11.2** Clicking on any third-party link or enabling any third-party plugin or service may allow the third-party to collect and share data about You. We do not have control over any third-party link, third-party website or a third-party service and are not responsible for their privacy policies. When You leave Our Website, We encourage You to read the privacy policy of every third-party website.
- 11.3** We are not responsible for any form of transmission, whatsoever, received by You from any third-party website. Accordingly, We do not make any representations concerning the privacy practices or policies of such third parties or terms of use of such third party website, nor do We control or guarantee the accuracy, integrity, or quality of the information, data, text, software, music, sound, photographs, graphics, videos, messages or other materials available on such third party website. The inclusion or exclusion does not imply any endorsement by Us of the third-party website, the website's provider, or the information on the website. The information provided by You to such third-party website shall be governed in accordance with the privacy policies of such third-party website and it is recommended that You review the privacy policy of such third-party website prior to using such website.

## **12. PERSONAL INFORMATION RETENTION**

- 12.1** We will only retain Your Personal Information for as long as necessary to fulfill the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 12.2** To determine the appropriate retention period for Your Personal Information, We consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of Your Personal Information, the purposes for which We process Your Personal Information and whether We can achieve those purposes through other means, and the applicable legal requirements.
- 12.3** In some circumstances, We may anonymize or obfuscate Your Personal Information (so that it can no longer be associated with You) for research or statistical purposes. In this case, We may use this Personal Information indefinitely without further notice to You.

## **13. COOKIES**

- 13.1** Cookies are small data files that are stored on Your device. We use cookies and other tracking technologies to distinguish You from other users of the Website and to remember Your preferences. This helps Us provide You with a good experience when You use Our Website and also allows Us to improve the services.

**13.2** We identify You by way of using cookies. The cookies shall not provide access to data in Your device such as email addresses or any other data that can be traced to You personally. The Personal Information collected by way of cookies will allow Us to administer the services and provide You with a tailored and user-friendly service. The cookies shall enable You to access certain features of the Website. Most devices can be set to notify You when You receive a cookie or prevent cookies from being sent. If You prevent cookies from being sent, it may limit the functionality that We can provide when You visit the Website or try to access some of the services provided by Us.

**13.3** The option of accepting cookies is up to You, however certain features of the Website including Content and the forms may not be accessible without accepting cookies. Please note that most Internet browsers will allow You to stop cookies from being stored on Your computer and to delete cookies stored on Your computer. If You choose to eliminate cookies, the full functionality of the Website may be impaired for You.

**13.4** To browse anonymously, You may set Your browser to disable cookies or delete cookies. Most cookies are session cookies that are automatically deleted from Your hard drive when You close the browser. Additionally, You may encounter cookies or other similar devices on certain pages of the Website that are placed by third parties. We do not control the use of cookies by third parties and shall not be liable for any reason whatsoever for these third-party cookies.

**13.5** We may use third party service providers to help Us analyse certain online activities. For example, these service providers may help us measure the performance of Our online campaigns or analyse visitor activity on the Website. We may permit these service providers to use cookies and other technologies to perform these services for Carepal. We do not share any Personal Information with these third party service providers, and these service providers do not collect such Personal Information on Our behalf. Our third party service providers are required to comply fully with this Privacy Policy.

## **14. BUSINESS TRANSITIONS**

You agree and acknowledge that in the event We go through a business transition, such as a merger, divestiture, acquisition by another organization, or sale of all or a portion of Our assets, or in the unlikely event of bankruptcy Your Personal Information might be among the assets transferred.

## **15. GRIEVANCE OFFICER**

In accordance with Information Technology Act, 2000 and rules made there under, the name and contact details of the Grievance Officer who can be contacted with respect to any complaints, questions, comments, practices or concerns including those pertaining to breach of Terms & Conditions, Privacy Policy, and other policies or questions is provided below:

**Name:** Piyush Birla

**Address:** 3<sup>rd</sup> Floor, A wing, Vaman Techno Centre, Marol Makwana Road, Andheri East, Mumbai - 400059, Maharashtra India; Email: info@impactguru.com

**Email:** [greivance@carepalmoney.com](mailto:greivance@carepalmoney.com)

## **16. CHANGES TO THIS POLICY**

Carepal may update, modify and amend any of the terms of this Privacy Policy at any time without prior intimation to You and any changes will be effective upon posting. In the event that there are material changes to the way We treat Your Personal Information, We will provide notice through the Website. We may also notify You by email, in Our discretion. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing or availing the Website. Your continued use of the Website, following changes to the Privacy Policy, will constitute Your acceptance of those changes. We will use Your consent in a manner consistent with the Privacy Policy in effect at the time You submitted the information, unless You consent to the new or revised policy.

## **17. RESTRICTION OF LIABILITY**

- 17.1** We make no claims, promises or guarantees about the accuracy, completeness, or adequacy of the contents of this Website and expressly disclaim liability for errors and omissions in the contents of this Website.
- 17.2** No warranty of any kind, implied, expressed or statutory, including but not limited to the warranties of non-infringement of third party rights, title, merchantability, fitness for a particular purpose and freedom from computer virus, is given with respect to the contents of the Website or its hyperlinks to other internet resources.
- 17.3** Reference in this Website to any specific commercial products, processes, or services, or the use of any trade, firm or corporation name is for the information and convenience of the public, and does not constitute endorsement, recommendation, or favouring by Us.

## **18. EFFECTIVE DATE**

This policy was updated and became immediately effective on 10<sup>th</sup> May 2023.