

TERMS OF USE & PRIVACY POLICY

Approved by	Board of Directors
Approved date:	25 th September, 2021
Original Issue Date:	25 th September, 2021
Effective Date:	25 th September, 2021

Terms of Use and Privacy Policy

Smart Prism Fincap Pvt Ltd along with its Affiliates/ Group companies (SPFPL) recognizes the importance of maintaining your privacy. SPFPL is committed to maintain the confidentiality, integrity and security of all information of its users. SPFPL collects and handles certain information it may collect and/or receive from you via the use of this Website or otherwise. By visiting and/or using our website, you are accepting and consenting to the practices described in this Privacy Policy.

By using or continuing to use the Website you agree to our use of your information (including sensitive personal information as defined under the Information Technology Act, applicable rules, notification etc.), as may be amended from time to time by the Website in its discretion.

Purpose of gathering Personal Information

The information we take from customers helps us personalize and continually improve your experience on the Website/App. Here are the types of information we gather.

We receive and store any information you enter on our App/Website or give us in any other way. You can choose not to provide certain information but then you might not be able to take advantage of many of our services and features.

We receive and store certain types of information whenever you interact with us. For example, we may use "cookies" and we may obtain certain types of information when your web browser accesses the Website or advertisements and other content served by or on behalf of the Website on other websites. We may also receive/store information about your location and your mobile device, including a unique identifier for your device. We might receive information about you from other sources and add it to our account information.

We use your information in order to:

- Assist our business partners in facilitating and delivering services to you, process your applications, communicate with you about products, services and promotional offers.
- Respond to queries, or requests submitted by you, and resolve your grievances/issues/problems with any services supplied to you.
- Administer or otherwise carry out our obligations in relation to any agreement with our business partners.
- Send you information about special promotions or offers. We might also tell you about new features or products/services. These might be our own offers or products/services, or third-party offers or products/services with whom SPFPL has a tie-up.
- Use your information for internal analysis and to provide you with location-based services, such as advertising, search results, and other personalized content.
- Use this information to improve our platform, prevent or detect fraud or abuses of our Website/App and enable third parties to carry out technical, logistical or other functions on our behalf. We may combine information we get from you with information about you we get from third parties.
- Send you notices, communications, and recommend services that might be of interest to you, update our records and generally maintain your accounts with us, display content and customer reviews.
- As otherwise provided in this Privacy Policy.

Use of Personal Information

SPFPL collects your information when you register for an account, when you use its products or services or visit its Website's page(s). When you register with SPFPL, you are asked for your Full Name, Email address and Mobile Number. Once you register at the Website/App and sign in you are not anonymous

to us. Also, you are asked for your contact number during registration and may be sent SMS, notifications about our services to your wireless device. Hence, by registering you authorize SPFPL (including its business partners and affiliates) to send texts and email alerts to you with your login details and any other service requirements, including promotional mails and SMS, even if you have registered yourself under DND or DNC or NCPR services. Your authorization shall be valid as long as your account is not deactivated.

Some features of this Website or our Services will require you to furnish your personally identifiable information as provided by you under your account section on our Website.

You also agree and consent to us for collecting, storing, processing, transferring and sharing information (including sensitive personal information) related to you with third parties or service providers for the purposes as set out in this Privacy Policy.

Information Sharing:

SPFPL will not sell or rent or otherwise disclose your information for commercial purposes to anyone in a way that is contrary to the commitments made and/or other than as set forth in this Privacy Policy. Notwithstanding the foregoing, we may share your information to an affiliate and/or business partner. SPFPL may also share, sell, and/or transfer your personally identifiable information to any successor-in-interest as a result of a sale of any part of SPFPL business or upon the merger, reorganization, or consolidation of it with another entity on a basis that it is not the surviving entity. For the purposes of this paragraph, "affiliate" means any person, company, or SPFPL directly, or indirectly through one or more intermediaries, that controls, is controlled by or is under common control with SPFPL (The term "control," as used in the preceding sentence, shall mean with respect to any person, the possession, directly or indirectly, of the power, through the exercise of voting rights, contractual rights or otherwise, to direct or cause the direction of the management or policies of the controlled person. As used in this Privacy Policy, the term "Person" includes any natural person, corporation, partnership, limited liability company, trust, unincorporated association, or any other entity).

We limit the collection and use of your personal information. We may make anonymous or aggregate personal information and disclose such data only in a non-personally identifiable manner. Such information does not identify you individually. Access to your Account information and any other personally identifiable information is strictly restricted and used only in accordance with specific internal procedures, and for the purposes set out in this Privacy Policy, in order to operate, develop or improve our services. We may use third party service providers to enable providing you with our services and we require such third parties to maintain the confidentiality of the information we provide to them, under our contracts with them.

We may also share your information, without obtaining your prior written consent, with government agencies mandated under the law to obtain information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation. You agree and consent for the Website to disclose your information, if so required, under applicable law.

There are a variety of products/services such as loans and credit cards offered by third Parties on the Website, such as lenders, banks, credit card issuers. If you choose to apply for these separate products or services, disclose information to these providers, then their use of your information is governed by their privacy policies in addition to the Privacy Policy of the Website. SPFPL is not responsible for their privacy policies. We encourage you to visit and read about the privacy notices and procedures adopted by these third parties/providers, when you apply for their products or services.

Personal Information Security

SPFPL understands that the confidentiality, integrity, and availability of your information are vital to our business operations and our own success. We employ appropriate technical and organizational security measures at all times to protect the information we collect from you. 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, you are responsible for maintaining the confidentiality and security of your login id and password, and may not provide these credentials to any third party.

Your Control Over Your Personal Information:

It's important to note that the information we use about you helps us provide you with products, services and experiences that benefit you. You have the ability to control how your non-personal information is collected and used online.

You also have the ability to choose what personal information, including what sensitive personal information (i.e., your financial information) you provide to us. However, if you choose not to provide all of the information and data that is requested of you, we may not be able to provide you with the Services that you have subscribed to.

You may, at any time while availing of our Services or otherwise, withdraw the consent given earlier to us to collect and use your sensitive personal data or information by writing to us at D 130, Okhla Industrial Area Phase 1, New Delhi 110020 or e-mail at info@SmartPrismFincap.com. and making a request for termination of the services agreed to per the agreed terms.

When you provide your contact details, we will use it to send you general notices or important news about your account, request your feedback or opinions and provide updates on special deals and offers that might interest you.

We believe you should be able to choose what kinds of information you receive via email/SMS. If you do not want to receive marketing materials by email/SMS, you can write to us at info@SmartPrismFincap.com. Please note that it may take about 30 days to process your request. Please keep in mind that we will continue to notify you by email /SMS/via phone calls regarding your services with us, even after you have opted out.

SPFPL is not responsible for the authenticity of any personal information or sensitive personal data or information supplied to it by you or any third party.

Third-Party Advertisers and Links to Other Websites

Third Party Advertising

We may use third-party advertising companies and/or ad agencies to serve ads when you visit our Website. These companies may use information (excluding your name, address, email address, or telephone number) about your visits to this Website in order to provide advertisements on this Website and other third-party websites about goods and services that may be of interest to you.

We use third-party service providers to serve ads on our behalf across the internet and sometimes on this Website. They may collect anonymous information about your visits to Website, and your interaction with our products and services. They may also use information about your visits to this and other Websites for targeted advertisements for goods and services. This anonymous information is

collected through the use of a pixel tag, which is industry standard technology used by most major Websites. No personally identifiable information is collected or used in this process.

Links to Other Websites

We may use third-party advertising companies and/or ad agencies to serve ads when you visit our Website. These companies may use information (excluding your name, address, email address, or telephone number) about your visits to this Website in order to provide advertisements on this Website and other third-party websites about goods and services that may be of interest to you.

There might be affiliates or other sites linked to SPFPL. Personal information that you provide to those sites are not our property. These affiliated sites may have different privacy practices and we encourage you to read their privacy policies of these websites when you visit them.

Changes to this Privacy Policy

SPFPL 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 you to periodically review. Checking the effective date below allows you to determine whether there have been changes since the last time you reviewed the statement.

***** END *****

Grievance Officer

In case you have any grievances, clarification or want to address any discrepancy with respect to the processing of any of the information/data you provided to SPFPL, please contact our Grievance Officer. The name and contact details of the Grievance Officer are provided below:

Name: Pradeep Lalwani

Phone: 9811207207

Email: Grievance@SmartPrismFincap.com

Address: D 130, Okhla Industrial Area Phase 1, New Delhi, Delhi 110020, India