

PRIVACY POLICY

1. INTRODUCTION:

Arnav Assets Solutions Private Limited which owns and runs the platform known as “Arnav Solutions” (hereinafter referred to as “**Arnav Solutions/we/our**”) acknowledges the expectations of its customers (hereinafter referred to as “**customer/you/your**”) with regard to privacy, confidentiality and security of personal information that resides with Arnav Solutions. Your privacy is very important to us. We do not sell your personal information to third parties for their marketing purposes without your explicit consent. Please read this privacy policy (hereinafter referred to as “**Privacy Policy**”) to learn more about the ways in which we use and protect your personal information.

The privacy practices of this statement apply to our services available under the domain and sub domains of www.arnavsolutions.com (hereinafter referred to as “**Website**”) and apply generally to our parent, affiliates, subsidiaries or joint venture websites. 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.

Arnav Solutions is strongly committed to protect the privacy of its customers and has taken all necessary and reasonable measures in line with the best industry practice to protect the confidentiality of the customer information and its transmission through the Website and it shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Policy.

By accepting the Privacy Policy and the terms and conditions of Arnav Solutions during the registration process (“**Terms and Conditions**”), you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy forms an integral part of and is subject to the General Terms and Conditions of Arnav Solutions and any other user specific terms and conditions made available on the Website.

2. APPLICABILITY:

This Privacy Policy is applicable to the personal information which is shared/ uploaded by you, as and when you avail the services through usage of the Website and which Arnav Solutions may become privy to. By visiting and/or using our Website, you agree to this Privacy Policy. Further, this Privacy Policy applies to all current and former visitors of the Website and to our customers, including but not limited to any person who accesses the Website in connection with the services provided on the portal. In case of our non-individual customers, it also applies to all their employees, agents and personnel, who are required to access the Website in relation to the services provided by Arnav Solutions. It is strongly recommended for you to return to this page periodically to review the most current version of the Privacy Policy. Arnav Solutions reserves the right at any time, at its sole discretion, to change or otherwise modify this Privacy Policy without prior notice, and your continued access or use of this Website signifies your acceptance of the updated or modified Privacy Policy. However, if we make any material change to the Privacy Policy, we will notify you by means of a notice on this Website prior to the change becoming effective.

3. INFORMATION WE COLLECT:

When you use our Website, we collect and store your personal information from you. Our primary goal in doing so is to provide a safe, efficient, smooth and customized experience. This allows us to provide services and features that most likely meet your needs, and to customize our Website to make your experience safer and easier. Importantly, we only collect personal information about you that we consider necessary for achieving this purpose. In general, you can browse the Website without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. We may automatically track certain information about you based upon your behaviour on our site. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users. This information is compiled and analyzed on an aggregated basis.

4. **EXPRESS CONSENT:**

- i. You while providing the details/documents over the Website, including but not limited to personal information, expressly consent to Arnav Solutions (its affiliates and business partners) to contact you, to make follow up calls in relation to the services provided through the Website.
- ii. The usage of the Website may also require you to provide consent for keying in/ uploading your personal information ("**Personal Information**") and sensitive personal data or information (including but not limited to user ids and passwords) ("**Sensitive Information**"), as may be necessary to process your application through the Website. Sensitive Information keyed in/ uploaded shall be required for enabling hassle free, faster and paperless (to the extent possible) processing of applications for services opted / availed by you.
- iii. You hereby authorize and expressly consent to us sharing your demographic and Personal Information with third parties including but not limited to credit information companies to do an aggregate check of your credit profile and for Arnav Solutions to send you communications and offers by agreeing to the General Terms and Conditions while accessing the Website. You hereby also grant consent to Arnav Solutions to procure credit information and indicative scores from the credit information companies on your behalf.
- iv. Arnav Solutions reserves the right (and you expressly authorize Arnav Solutions) to share or disclose your Personal Information/ Sensitive Information when Arnav Solutions determines, in its sole discretion, that the disclosure of such information is necessary or appropriate under the law for the time being in force.
- v. The information submitted by you will not be considered as sensitive if it is freely available and accessible in the public domain or is furnished under the Right to Information Act, 2005 or any other law for the time being in force.

5. **PURPOSE AND USAGE:**

Arnav Solutions will not sell or rent your Personal Information to anyone, for any reason, at any time. However, we will be sharing your Personal Information/ Sensitive Information with our affiliates and business partners, where we feel that they will be able to assist you better for the purpose of providing the services available on the Website to you. Arnav Solutions uses the information collected and appropriately notifies you to manage its business and offer an enhanced, personalized online experience to you on its Website. By registering on the Website you authorize Arnav Solutions to send texts and email alerts to you and any other service requirements, including promotional mails and SMSs. Further, it enables Arnav Solutions to:

- i. analyse usage of the Website and to improve the services;
- ii. send you any administrative notices, offer alerts and communications relevant to your use of the services;
- iii. enable you to apply for certain services for which you have chosen to apply;
- iv. carry market research, project planning, troubleshooting issues, detecting and protecting against error, fraud or other criminal activity;
- v. bind third-party contractors that provide services to Arnav Solutions and are bound by these same privacy restrictions;
- vi. comply with all applicable laws and regulations;
- vii. enforce Arnav Solutions General Terms and Conditions and other terms and conditions displayed on/governing the Website.

For availing certain services through the Website, we will require you to provide/upload on the Website certain Personal Information and/or Sensitive Information, including but not limited to Know Your Customer (KYC) documents like address proof identity proof such as telephone bill, electricity bill, Bank Account Statement, registered sale agreement/registered lease agreement and personally identifying information about a potential co-loan applicant (should you select this option), and to participate on our forum boards, a username (collectively the "**Registration Information**"). In case where a key person has been appointed by a corporate customer, the key person would be required to submit his/her personal details such as Aadhaar card, passport, driving license and voter ID card.

In certain cases, you may be required to provide your third-party account credentials ("**Account Credentials**") to allow Arnav Solutions to retrieve your account data at those other financial institutions ("**Account Information**") for your use. Your Account Credentials are not stored in our system. However, Arnav Solutions shall not be liable to you against any liability or claims which may arise out of such transactions being carried on your own accord.

We may also use third party service providers to provide the services to you, such as sending e-mail messages on our behalf or hosting and operating a particular feature or functionality of the services. Our contracts with these third parties outline the appropriate use and handling of your information and prohibit them from using any of your Personal Information and/or Sensitive Information for purposes unrelated to the product or service they are providing. We require such third parties to maintain the confidentiality of the information provided to them; however we shall not be liable for disclosure of any of your Confidential Information by such third party service providers.

6. **DISCLOSURE / SHARING:**

Arnav Solutions does not disclose sensitive personal data or Personal Information including Sensitive Information of a customer except as directed by law or as per mandate received from the customer / applicant. Upon your written request Arnav Solutions will provide you with information on whether we hold any of your Personal Information and/or Sensitive Information. No specific information about customer accounts or other personally identifiable data is shared with non-affiliated third parties unless any of the following conditions is met:

- i. To help complete a transaction initiated by you

- ii. To perform support services through a third party service provider, provided it conforms to the Privacy Policy of Arnav Solutions and your prior consent to do so is obtained
- iii. You have specifically authorized it
- iv. The disclosure is necessary for compliance of a legal obligation or as required by law, such as to comply with a writ of summons, or similar legal process
- v. The information is shared with Government agencies mandated under law
- vi. The information is shared with any third party by an order under the law
- vii. When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Arnav Solutions is not responsible for the privacy policies of the third party entities that are involved in providing any services on the Website.

7. LEGAL REQUESTS:

We cooperate with law enforcement and regulatory inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights, to help protect you and the community from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorize us to) disclose your name, city, state, telephone number, email address, UserID history, fraud complaints, and listing history without a subpoena. Further, we can (and you authorize us to) disclose your name, street address, city, state, zip code, country, phone number, email, and company name to Intellectual Property right's owners under confidentiality agreement, as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity. Due to the existing regulatory environment, we cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy.

8. INTIMATION BY CUSTOMERS REGARDING CHANGE IN REGISTRATION INFORMATION:

If your Registration Information provided to us when you had applied on our Website changes, you are requested to update it immediately. To review and update your Personal Information and Sensitive Information and to ensure that the same is accurate while your application is in process, you may contact us at support@arnavsolutions.com. You will not be able to update the information you have provided in any application after a decision has already been made on it; however you may create and submit a new application with your updated information.

Note: We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at support@arnavsolutions.com. We will respond to your request within a reasonable timeframe. However, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and to enforce our agreements.

9. LOG FILES:

This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp. We may use the collected log information about you to improve services offered to you, to improve marketing, analytics, or Website functionality.

10. TRACKING TECHNOLOGIES:

Arnav Solutions and its partners/affiliates do not use cookies or similar technologies to analyze trends, administer the Website, track users' movements around the Website, and to gather demographic information about our user base as a whole.

11. THIRD PARTIES WILL NOT BE GIVEN YOUR PERSONAL INFORMATION UNLESS YOU DIRECT ARNAV SOLUTIONS TO DO SO:

If you choose to apply for any add on services offered by third parties through the Website and disclose information to these providers, or grant them permission to collect information about you, then their use of your information is governed by their respective privacy policies. You should evaluate the practices of these external services providers before deciding to use their services. Arnav Solutions is not responsible for their privacy practices.

12. ADDITIONAL POLICY INFORMATION:

Widgets: Our website includes Widgets, which are interactive mini-programs that run on our Website to provide specific services from another company (e.g. displaying the news, opinions, etc). Personal Information, such as your email address, may be collected through the Widget. Cookies may also be set by the Widget to enable it to function properly. Information collected by this Widget is governed by the privacy policy of the company that created it and not by Arnav Solutions.

Links to 3rd Party Sites: Our Website may include links to other websites whose privacy practices may differ from those of Arnav Solutions. If you submit your Personal Information and/or Sensitive Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

13. WE KEEP YOUR DATA SECURE:

We follow generally accepted standards to protect the Personal Information and Sensitive Information submitted to us, both during transmission and once we receive it. Since no method of transmission over the Internet, or method of electronic storage, is 100% secure, therefore, we cannot guarantee its absolute security. If you have any questions about security on our Website, you can contact us at support@arnavsolutions.com.

We use a combination of firewalls, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect Arnav Solutions online accounts and systems from unauthorized access.

When you register for the service, Arnav Solutions requires a password from you for your privacy and security. Arnav Solutions transmits information such as your Registration Information for Website or Account Credentials securely.

Our servers are in secure facilities of reputed Data Centre Operators.

Our databases are protected from general employee access both physically and logically. We encrypt your service password so that your password cannot be recovered, even by us. All backup drives and tapes also are encrypted.

We enforce physical access controls to our buildings.

No employee may put any sensitive content on any insecure machine (i.e., nothing can be taken from the database and put on an insecure laptop).

Arnav Solutions has been verified for its use of SSL encryption technologies.

14. ALL PRIVATE INFORMATION IS ENCRYPTED AND COMMUNICATED SECURELY:

All communications between your computer and our Website that contain any Personal Information and Sensitive Information are encrypted. This enables client and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

15. YOU ARE RESPONSIBLE FOR MAINTAINING THE CONFIDENTIALITY OF YOUR LOGIN ID AND PASSWORD:

You are responsible for maintaining the security of your Login ID and Password, and may not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at support@arnavsolutions.com. We are not responsible if someone else accesses your account through Registration Information they have obtained from you or through a violation by you of this Privacy and Security Policy or Arnav Solutions General Terms and Conditions.

If you have any security related concern, please contact us at support@arnavsolutions.com. We will work closely with you to ensure a rapid and personal response to your concerns.

16. CONTACT US WITH ANY QUESTIONS OR CONCERNS (GRIEVANCE REDRESSAL):

If you have any grievance or complaint, questions, comments, concerns or feedback in relation to the processing of information or regarding this Privacy Policy or any other privacy or security concern, send an e-mail to support@arnavsolutions.com.

17. The name and contact details of the Grievance Officer is Prajakta Shidhore.

18. FEEDBACK:

If you have an unresolved privacy or data use concern that has not been addressed satisfactorily, you are advised to contact Prajakta.Shidhore@arnavsolutions.com.

19. NOTICE:

The effective date of this Policy, as stated below, indicates the last time this Policy was revised or materially changed.

20. EFFECTIVE DATE:

21st May 2018