

PRIVACY POLICY

We Finplifi Financial Planners and Consultants, ensure our firm commitment to your privacy vis-à-vis the protection of your priceless information. In order to endow you with our uninterrupted use of services, we may collect and, in some circumstances, disclose information about you. To enhance better protection of your privacy we provide this notice explaining our information practices and the choices you can make about the way your information is collected and used. If you have any questions or concerns regarding this Privacy Policy, you may contact our Customer Support Desk at +91 6362 388 452

1. Scope of policy

This policy applies to www.finplifi.com, (hereinafter known as the Website). It regulates the processing of information relating to you and grants you various rights in respect of your personal data.

2. Definitions

- i. "We", "Our", and "Us", either in capital letters or not, shall mean and refer to the creators of this Privacy Policy, Finplifi Financial Planners and Consultants.
- ii. "You", "Your", "Yourself" and "User", either in capital letters or not, shall mean and refer to natural and legal entities that enter and/or use the Website, either to put up content or to view such content that has been put up.
- iii. "Personal Information" shall mean and refer to any personally identifiable information that We may collect from You. For removal of any doubts, please refer to Clause 3 below.
- iv. "Third Parties" refer to any application, Website, firm or individual apart from the User and the owner of the Website.

3. Information Collected

- i. You have to register with your Personal Information on the Website to enjoy the services offered by our Website. We collect the following general types of information about you when you visit our website: personal data, demographic information, behavioural information, and indirect information (cumulatively referred to as "Personal Information"). Personal Data means any information that may be used to identify an individual. This includes but not is limited to:
 - Name
 - Mailing Address
 - Telephone Number
 - Email ID
 - Any other information that can be used to identify you

- Financial Information (Since we are investment advisers, such data is essential for the proper delivery of intended services to you).
- ii. Demographic information is information that is not unique to you in the sense that it refers to selected population characteristics, such as your PIN code, age, preferences, gender, race or ethnicity, occupation, career history, interests and favourites.
- iii. Behavioural information is information regarding how you use the Website. This includes the areas of our Website that you visit, what services you access, and information about your computer hardware and software including your IP address, browser and operating system type, domain names, access times and referring website addresses. This information is necessary for analysing the use of resources, troubleshooting problems, preventing fraud, and improving our services.
- iv. Indirect information may be collected by us about you when you use certain Third-Party services on our Website and the collection of such information is considered necessary for that purpose. In order to personalise our services to you, we may collect information about you from Third Party sources that provide it to us.

4. Consent to collect and use the information

By using this Website, you consent to the terms of this Privacy Policy, to our processing of Personal Information for the purposes given in this policy, as well as the Personal Information on the Web and from other Third Parties.

5. Use of information

5.1. We use the information we gather on the Website for the following purposes:

5.1.1. Individual User information:

- To provide our services. This includes providing communications, promotions and information on events which may be of interest to you
 - To respond to any queries you may have and to communicate information to you. These include sending you e-mail or other communications regarding updates at the Website, to contact you about your opinion of current products and/or services or potential new products and/or services that may be offered
 - To operate and improve the Website in order to foster a positive user experience
 - To deliver the products and service that We offer to those who post content on the Website and those who view such content
 - To comply with the applicable laws; and
 - To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law
- At the time of registration, you have to fill in your Personal Information in order to obtain an account, which can be used subsequently to log into the Website, if you want to post content on the Website. However, if you want to view already existing

content, you need not register and provide Personal Information associated with the same.

5.1.2. Information about all visitors collectively: We gather information about all of our users collectively, such as what areas users visit most frequently and what services users access the most. Such data is used anonymously and in the aggregate. This information helps us determine what is most beneficial for our users, and how we can continually create a better overall experience for them. We may also use this information for the purposes of complying with the applicable laws.

6. Disclosure of the information

6.1. We disclose the information to Third Parties in the method specified below, including, but not limited to:

6.1.1. Disclosing the content posted by you on the Website, in order that viewers may obtain information about present and future events around the world, in addition to availing of the products and/or services provided.

6.1.2. Sharing your information with Third Parties who help us in the delivery of our own services to you. Information is disclosed to companies and individuals who are authorised by us perform functions on our behalf.

6.1.3. Disclosing such information to Third Parties if you consent to such disclosure. If you indicate that you would like to receive information about the opportunities, products or services of Third Parties, we supply your contact information to such select Third Parties, or others for the purpose of sending you e-mail or otherwise communicating with you.

6.1.4. We may share this information with our partners and affiliates, but only in the aggregate, so that they too may understand how visitors use our Website, and also create a better overall experience for you. We also share aggregated anonymous information about visitors to the Website with our clients, partners, other Website visitors, and other Third Parties so that they can understand the kinds of visitors and how they use the Website in order to serve advertisements and other kinds of marketing information to you on our Website.

6.1.5. We may disclose and transfer such information to a Third Party who acquires our business units, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets. You will be notified of the sale of all or a substantial portion of our business to a Third Party by email or through a prominent notice posted on the Website.

6.1.6. We disclose information if legally required to do so, pursuant to an order from a governmental entity, court of law, etc, or in good faith. We will disclose the information bases to:

- conform to legal requirements or comply with legal process
- protect our rights or property or that of our affiliated companies

- prevent a crime or protect national security
- or protect the personal safety of users or the public

We shall however immediately delete all such information upon withdrawal of your consent for the same through the '**unsubscribe**' button or through an email to be sent to support@finplifi.com

6.1.7 To the extent possible, we provide you with the option of not divulging any specific information that you wish for us not to collect, store or use. You may also choose not to use a particular service or feature on the Platform and opt-out of any non-essential communications from the platform.

6.1.8 Further, transacting over the internet has inherent risks which can only be avoided by you following security practices yourself, such as not revealing account/login related information to any other person and informing our customer care team about any suspicious activity or where your account has/may have been compromised.

6.1.9 We use your tracking information such as IP addresses, and or Device ID to help identify you and to gather broad demographic information and make further services available to you.

6.1.10 We will not sell, license or trade your personal information. We will not share your personal information with others unless they are acting under our instructions or we are required to do so by law.

7. External links on the Website

7.1. The Website may include advertisements hyperlinks to other websites, applications, content or resources. We have no control over such external links present in the Website, which are provided by persons or companies other than us. You acknowledge and agree that we are not responsible for any collection or disclosure of your Personal Information by any external sites, applications, companies or persons, nor do we endorse any advertising, products or other material on or available from such external application, websites or resources.

7.2. You further acknowledge and agree that we are not liable for any loss or damage which may be incurred by you as a result of the collection and/or disclosure of your personal information by external applications, sites or resources, or as a result of any reliance placed by you on the completeness, accuracy or existence of any advertising, products or other materials on, or available from such applications, websites or resources. These external applications, websites and resource providers may have their own privacy policies governing the collection, storage, retention and disclosure of your Personal Information that you may be subject to. We recommend that you enter the external application or website and review their privacy policy.

7.3. We allow third parties/individuals to display advertisements when you use the Website.

8. Confidentiality

8.1. We do not collect sensitive personal data or information of users like password of your e-mail account, password of your account on the Website, financial information such as bank account details or credit card or debit card or other payment related details, physical and mental or other health conditions or medical records and history, biometric information such as finger prints, voice & facial patterns and DNA, or any other sensitive information which is confidential or sensitive by its nature, without your explicit consent or unless necessary by law.

8.2. We do not disclose information about your individual visits to www.finplifi.com to any outside parties without your consent, except when to the extent necessary or appropriate to comply with applicable laws, rules or regulations or in legal proceedings when such information is relevant.

9. Update and remove information/account

9.1. You have access to review, correct, update, change or delete your account profile information or resume at any time. Simply log into your account, go to your profile or resume, and make the necessary changes.

9.2. Before providing you with a copy of your personal information or correcting, updating or deleting such information, we reserve the right to verify and authenticate your identity and the personal information to which you have requested access. Access to or correction, updating or deletion of your personal information may be denied or limited by us if it would violate another person's rights and/or as otherwise permitted by applicable law.

9.3. You may disable or delete your account on the Website at any point by making a suitable request, subject to applicable terms and conditions. However, we retain your personal data as long as the purpose for its usage exists, after which the same is disposed of by us except for any record retention required by applicable law, including Securities and Exchange Board of India (Investment Advisers) Regulations, 2013.

9.4. Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 require your transaction logs to be stored for a period of up to 5 years post the deletion of an account. In the event of the pendency of any legal / regulatory proceeding or receipt of any legal and / or regulatory direction to that effect, we may retain your personal data for longer periods.

10. YOUR RIGHTS

Unless subject to an exemption, you have the following rights with respect to your personal data:

- a. The right to request a copy of your personal data which we hold about you;
- b. The right to request for any correction to any personal data if it is found to be inaccurate or out of date;
- c. The right to withdraw Your consent to the processing at any time;
- d. The right to object to the processing of personal data;

- e. The right to lodge a complaint with a supervisory authority.
- f. The right to obtain information as to whether personal data are transferred to a third country or to an international organization.

Where you hold an account with any of our services, you are entitled to a copy of all personal data which we hold in relation to you. You are also entitled to request that we restrict how we use your data in your account when you log in.

11. Changes to this privacy policy

10.1. We reserve the right to update, change or modify this policy at any time. The policy shall come to effect from the date of such update, change or modification. If you continue to use your account and/or access the Website even after any such changes have been made, it would be deemed to be an implied consent to the changed policy.

12. Cookies and other tracking technologies

12.1. Some of our web pages utilize "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect information about Website activity. Some cookies and other technologies may serve to recall personal information previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.

12.2. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original User ID and password to gain access to certain parts of the Website.

12.3. Tracking technologies may record information such as internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; stream patterns; and dates and times that our site is accessed. Our use of cookies and other tracking technologies allow us to improve our Website and your experience. We may also analyse information that does not contain personal information for trends and statistics.

13. Reasonable Security Practices and Procedures

13.1. We are committed to ensuring that your information is secure. We have taken various steps and measures to protect the security of your Personal Information from misuse, loss, unauthorised access, modification or disclosure. we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

14. Disclaimer

14.1. We cannot ensure that all of your private communications and other personal information (including sensitive information like credit card information and bank account number) will never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although we are committed to protecting your privacy, we do not promise, and you should not expect, that your

personal information or private communications will always remain private. As a user of the Website, you understand and agree that you assume all responsibility and risk for your use of the Website, the internet generally, and the documents you post or access and for your conduct on and off the Website.

15. Indemnity

You agree and undertake to indemnify us in any suit or dispute by any Third Party arising out of disclosure of personal information by you to Third Parties, either through our Website or otherwise and your use and access of websites, applications and resources of Third Parties. We assume no liability for any actions of Third Parties with regard to your personal information, which you may have disclosed to such Third Parties.

16. Limitations of Liability

16.1. We are not liable to you in relation to the contents of, or use of, or otherwise in connection with this Website:

- i. For any indirect, special, or consequential loss; or
- ii. For any business losses, loss of revenue, income, profits or notional profits, loss of business relationships, reputation, or goodwill, loss or corruption of information or data.
- iii. The limitation of liability is applicable even where we were expressly advised of the potential loss, subject to us taking reasonable care for the prevention of such loss.

17. Severability

17.1. Each paragraph of this privacy policy shall be and remain separate from and independent of and severable from all and any other paragraphs herein except where otherwise expressly indicated or indicated by the context of the agreement.

17.2. The decision or declaration that one or more of the paragraphs are null and void shall have no effect on the remaining paragraphs of this Privacy Policy.

18. Automated Decision Making

As a responsible Company, we do not use automatic decision-making or profiling.

19. Contact information

Any feedback or comments about this Privacy Policy is welcome and can be sent to support@finplifi.com. We will employ all commercially reasonable efforts to address the same.