



PRIVACY POLICY

Scope and Purpose of the Policy

This privacy policy (“**Policy**”) has been drafted in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**SPDI Rules**”) and other applicable laws that require publishing of the privacy policy for collection, usage, storage, disclosure and transfer of sensitive personal data or information.

Haqdarshak Empowerment Solutions Private Limited (hereinafter referred to as “**Haqdarshak**” “**us**”, “**our**” “**we**”, which shall mean and include its subsidiaries, affiliates, successors and assigns, owns and operates this platform whether accessible on www.haqdarshak.com, hd.haqdarshak.com, train.haqdarshak.com or such other URLs as may be designated by Haqdarshak (“**Website**”), or through our mobile applications Haqdarshak App, Haqdarshak agent app or such other applications as may be designated by Haqdarshak (“**App**”) (together the “**Platform**”). In the course of using the Platform or availing the services vide the online/ offline application forms and questionnaires, Haqdarshak may become privy to the personal information of its Users, including information that is of a confidential nature. “User(s)” or “you” shall mean and include all individuals, companies, private organisations, value chain entrepreneurs, consumers, employees, consultants, agents, that visit, use, deal with and / or interact with or transact through the Platform or avail our services.

Haqdarshak is strongly committed to protecting the privacy of its Users and has taken all necessary and reasonable measures to protect the confidentiality of the User information. Haqdarshak shall not be held liable for disclosure of the confidential information if such disclosure is in accordance with this Policy or in accordance with the terms of any agreements entered into with the Users.

We collect personal information from our stakeholders and this Policy describes our policies and procedures for collection, use, storage, processing, disclosure and protection of any information, including, but not limited to, business or personal information provided by you.

By visiting / accessing the Platform, and voluntarily providing us with information for the services or otherwise, you are consenting to our use of it in accordance with this Policy. This Policy does not apply to third-party websites / applications that are connected via links to our Platform. If you do not agree with the terms and conditions of this Policy, please do not proceed further to use / access this Platform.

We may update this Policy from time to time. You must periodically review the Policy for the latest information on our privacy practices.

Type of Information:

We collect, use and process various types of personal information about you to the extent appropriate for your relationship with us.

The personal information that we collect about you may include but is not limited to the data set out below and other personally identifiable information and sensitive personal data or information as defined in the SPDI Rules and Know Your Customer (KYC) Direction, 2016 as amended from time to time:

- Socio-economic and demographic data: This data shall include name, age, gender, income, caste, sub-caste, religion, landholding, family members, educational qualifications, nature of job, employment status, corporate status and any other additional details that may be required in order to determine the eligibility to various schemes declared by the government from time to time.



- Identity and Contact Data: This data includes contact information such as email address, mailing address, phone number, date of birth, financial information, if any, personal identifiers such as passport number, permanent account number, driving license, unique identifiers such as user name and account number;
- Financial and Transaction Data: This data shall be limited to your bank account number;
- Usage and Technical Data: Information relating to logs is automatically reported by the User's browser each time the User accesses a web page. When the User uses the Platform, Haqdarshak's servers automatically record certain information that the User's web browser or app sends whenever the User visits any website or uses any app. These server logs may include information such as the User's web request, Internet Protocol (IP) address, browser type, referring/ exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, location, application features used and other such information. Haqdarshak uses this information, which does not identify Users, to analyse trends, to administer the Platform, to track Users' movements around the Platform and to gather demographic information about the User base as a whole. Haqdarshak does not link this automatically-collected data to personally identifiable information;
- Location: We require information about your signup and current location, which we get from signals such as your IP address or device settings, to securely and reliably set up and maintain your account and to provide our services to you.

Subject to your settings, we may collect, use, and store additional information about your location- such as your current precise position or places where you have previously used our Platform to operate our services.

- Marketing and Communications Data: This includes both a record of your decision to subscribe or to withdraw from receiving marketing materials from us or from our third parties;
- Information that the Users provide when the Users write directly to Haqdarshak (including by way of e-mail);
- Information that the Users provide to Haqdarshak over telephone. Haqdarshak may make and keep a record of the information shared by the Users with Haqdarshak;
- Information that the Users provide to Haqdarshak by completing surveys; and
- To use the information for any other purpose permitted by applicable laws.

We may also collect, use and share non-personal information or anonymised data such as statistical or demographic data.

By accessing or connecting to the Platform or by providing the information sought by us, you authorize us to collect, store, use and retain such information and content in accordance with this Policy.

Links to other sites

To the extent that our Platform includes links to third-party websites, plug-ins and applications (including cookies and widgets by third party advertisers), it is important that you understand that by clicking on those links or enabling those connections you may allow third parties to collect or share data about you. Haqdarshak does not control these third-party websites and we are not responsible for their privacy statements. Please consult such third parties' own privacy statements.

Use of Information

We use and process User's personal information for a range of purposes, which may include but is not limited to:

- To provide services;

- To facilitate, process your requests and transactions and to provide you with transaction and post transaction-related services, providing, improving, and marketing our services, including site content and performance;
- To evaluate your use of the services;
- To monitor, improve and administer the Platform;
- To check the identity and suitability of clients for certain services;
- To ensure the security and operation of our information technology environment;
- To use it for marketing and advertising measures (e.g. newsletters via e-mail, online advertising);
- To maintain and manage your account with us;
- To verify your identity and compare your information to verify accuracy;
- To detect, prevent and investigate fraud;
- To comply with applicable laws, rules and regulations;
- To comply with the legal process to respond to requests from public, regulatory or government authorities;
- To monitor your compliance with any terms and conditions associated with our services, including to confirm your identity;
- To perform internal business processes such as data analysis, audits, developing and improving new services;
- To provide to third party services entity that provide services to Haqdarshak and are bound by these same privacy restrictions;
- As part of sale, merger or similar change of the business or its parent company, subsidiaries, affiliates and related group companies;
- To enable an actual or proposed assignee of Haqdarshak or transferee of Haqdarshak's rights to evaluate the transaction intended to be the subject of the assignment or transfer;
- To enable us to effectively communicate with you – for example to send you emails to inform you about your service with us, update you on applicable security and fraud monitoring alerts, or notices to you if there is any interruption of services or important notices about improvement of our services;
- To manage our business and to offer an enhanced, personalized online experience on the Platform and third-party websites; and
- For all other incidental and associated purposes relating to the provision of our services.

We process your personal information:

- where it is necessary to process your personal information in connection with the performance of a contract that we have with you;
- where it is necessary for our legitimate interests or the legitimate interests of a third party which requires us to put in place appropriate privacy measures to ensure that our legitimate interests are not outweighed by impacts on your interests, fundamental rights or freedoms;
- where we use your personal information to comply with our legal obligations such as, ensuring that we use your personal information to comply with anti-bribery and anti-money laundering requirements;
- in accordance with the applicable laws on data protection and for as long as required.

If none of the above applies, we may seek your explicit consent for specific forms of processing of your personal information, which you may decline or revoke at any time.

Collection of Information

We collect data, including your personal information, so that we can provide our services to you. We only collect as much personal information as we need for our required purposes.

Where we are required to collect your personal information by law, or need it to honour our terms and conditions (contracts), we will not be able to authorise and approve your application to receive our



service unless and until we have received the requested personal information and may be forced to cancel or suspend our service until such time it is received. We will notify you if this happens.

We collect information in different ways on our Platform or through offline application, such as when you directly give us your personal information. This includes when:

- You submit your details to us on our Platform so that we can contact you about our services;
- You apply for our services directly with us;
- You enter a competition, promotion or survey subject to applicable law;
- You request marketing material to be sent to you; or
- You send us a support request through our support desk.

We collect data using various technologies when you access and browse our Platform. This is Usage and Technical Data as described above.

We obtain personal information through third parties or if publicly available, such as:

- Profile data from social platforms and networks when user give us permission to do so and only if applicable;
- Technical data for example, for the purposes of conducting fraud and risk assessments;
- External third parties who have entered into contracts with us to assist us with our business operations and provided that such service providers adhere to our data protection requirements;
- Identity data and contact data from publicly available sources in accordance with applicable laws; and
- Internal third parties from specific third parties, such as audit support and information technology.

Storage of Information

We store and process User's personal information on cloud service provided by hosting providers within India. Some of the safeguards we use are firewalls and data encryption using SSL, and information access authorization controls. We use reasonable safeguards to preserve the integrity and security of User information against loss, theft, unauthorised access, disclosure, reproduction, use or amendment. To achieve the same, we use reasonable security practices and procedures as mandated under applicable laws for the protection of user information.

However, one should understand and accept that there's no guarantee that data transmission over the internet will be completely secure and that any information that User transmits to us is at User's own risk. We assume no liability for any disclosure of information due to errors in transmission, unauthorized third party access to our Platform and data bases or other acts of third parties, or acts or omissions beyond our reasonable control and User shall not be entitled to hold Haqdarshak responsible for any breach of security.

Disclosure of Information

We may share your personal information for any of the purposes described in the Policy.

Internal third parties: We may share your personal information with our parent company, subsidiaries, affiliates and related group companies, and other internal third parties in compliance with the Policy and any other appropriate confidentiality and security measures. Such internal third parties are committed to protecting personal information and to use it only for legitimate business purposes.

External third parties: We may share your personal information with (i) third party service providers under contract who assist us with our business operations; (ii) authorized financial institutions and



banking partners that we partner with to jointly create and offer services; (iii) credit bureaus to report financial data, as permitted by law; (iv) in the event Haqdarshak sells or buys any business or assets, it may disclose User's information to the prospective seller or buyer of such business or assets. Haqdarshak may also transfer or assign such information in the course of corporate divestitures, mergers or dissolution; (v) when required by law enforcement, government officials, statutory bodies, fraud detection agencies or other third parties; (vi) when we are compelled to do so by law (such as via a subpoena, court order or similar legal procedure) or under a duty to do so in order to comply with any legal obligation, or to protect the rights, property or safety of Haqdarshak, its Users or others.

Haqdarshak takes all reasonable organizational and technical measure to ensure that every third party involved in the processing of your personal information protection standards in accordance with the applicable laws and in accordance with the principles set out in the Policy.

Data Retention

Haqdarshak may store User's personal information for as long as required for the fulfilment of the purposes for which we collected it and as long as the User account is active or as needed to provide services to the User. The retention of personal information by Haqdarshak is determined by considering compliance with legal (contractual or statutory requirements), accounting and compliance reporting requirements.

If the User wishes to cancel its account or requests that Haqdarshak no longer uses its information to provide services, the User may contact us at unsubscribe@haqdarshak.com. Haqdarshak will retain and use User information as necessary to comply with its legal obligations, resolve disputes, and enforce its agreements or for other business purposes. Post termination of your account, Haqdarshak may continue to use your anonymized data aggregated or in combination with anonymized data of other users. We use this aggregated anonymized data for data analysis, profiling and research purposes, for example to gain insights about our users and their profiles. We may keep your contact information along with your application details (if any) for fraud prevention purposes and for the exercise/ defense of a legal claim or for providing evidence in legal proceeding(s). User's personal information however may remain on the servers unless otherwise deleted or purged permanently.

Rights of the User

We ensure that you may exercise your rights in accordance with applicable law:

1. Access information: The User has the right to access all information given to us and statements of our practices and policies in many circumstances, generally within one month of your request. You may send us an email at contactus@haqdarshak.com with the request of the information you wish to receive.
2. Review / update / delete information: If at any time you wish to review, update or delete the information provided to us at the time of registering with us or at any time thereafter, you may do so by signing into your account and amending the same. You may also send us an email at unsubscribe@haqdarshak.com. Upon your request, we will delete all of the content contained in your profile; however, please note that some information may remain in our records after deletion of such information from your account. We may also keep a copy of any such information for legal archival purposes as explained in the Policy.
3. Opt-out: You may opt-out of receiving promotional and marketing-related communications from us, after setting up an account, by sending us an email at unsubscribe@haqdarshak.com.
4. Right to not provide information: You can always opt not to provide information to us; however, please note that, some information may be needed to register with us or to take advantage of some of our special features.



5. Raise complaint: You can raise any discrepancies and grievances with respect to processing of information by us. The same shall be addressed in the manner set out in the Policy.
6. Withdraw consent: You can withdraw any consent to processing that you have given us and prevent further processing if there is no other legitimate ground upon which we can process your personal information.
7. Data portability: You can ask us to transmit the personal information that you have provided to us to a third party.

Exclusion

This Policy does not apply to any information other than information collected by Haqdarshak through the Platform including such information collected in accordance with the paragraph on “Collection of Information” above. This Policy shall not apply to any unsolicited information provided by the Users through the Platform or through any other means. This includes, but is not limited to, information posted to any public areas of the Platform. All such unsolicited information shall be deemed to be non-confidential and Haqdarshak shall be free to use, disclose such unsolicited information without limitation.

Cookies

Haqdarshak collects certain information from the User’s browser using small data files called “cookies.” The cookies help Haqdarshak recognize a customer if he or she visits multiple pages on the Platform during the same session, so that separate passwords are not required to access each page. These cookies terminate once the customer closes the browser. By default, Haqdarshak uses a persistent cookie that stores customer login ID (but not password) to make it easier for the customer to login when returning to the Platform. Haqdarshak encodes its cookies so that only Haqdarshak can interpret the information stored in them. The User may remove or block this cookie using the User’s browser settings to disable the feature.

Haqdarshak also stores transaction history. Haqdarshak may collect additional information in ways not specifically described herein. For example, Haqdarshak may track information related to interactions with customer service or responses from surveys or other feedback tools. Haqdarshak uses this information to continually improve the service provided to the customers.

Haqdarshak partners with third-party service providers to either display advertising on the Platform or to manage our advertising on other websites. Our third-party partner may use technologies such as cookies to gather information about your activities on the Platform and other websites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Web Beacons

The web pages of the Platform contain electronic images known as “web beacons” (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyse how the Platform is used. Web beacons may also be used in some of Haqdarshak’s emails so as to know which emails and links recipients have opened, allowing it to gauge the effectiveness of its customer communications and marketing campaigns.

No Waiver

The rights and remedies available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. It may be waived only in writing.



Delay in exercising or non-exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.

Security

Haqdarshak takes legal, technical and organizational measures that it considers necessary in order to maintain the security of user personal information, with due regard of the applicable obligations and exceptions under the legislation in force.

Haqdarshak follows the information technology regulations and standards regarding the protection of personal information.

Haqdarshak reviews the Policy regarding the collection, storage and processing of User's personal information, including physical security measures, to prevent adulteration, loss, query, use or fraudulent or unauthorized access to User's personal information. Haqdarshak has put in place procedures to deal with any suspected personal data breach and will notify user and any applicable regulator of a breach where we are legally required to do so. We also have a grievance redressal mechanism in place to address any complaints regarding our processing of the information provided by our users.

You are responsible for maintaining the security of your login ID and password and must 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 contactus@haqdarshak.com. We are not responsible if someone else accesses your account through the login credential they have obtained from you or through a violation by you of the Policy. If you have any security related concern, please contact us at contactus@haqdarshak.com. We will work closely with you to ensure a rapid and personal response to your concerns.

Minors

Haqdarshak does not voluntarily or actively collect, use or disclose personal information of minors, according to the minimum age equivalent in the relevant jurisdiction, without the prior consent of the parents or guardians of the minor. The services of Haqdarshak are not intended or designed to attract minors. If we learn that we collected the personal information of a minor according to the jurisdiction, without first receiving a verifiable parental consent, we will take steps to delete the information as soon as possible. We encourage parents to stay informed about the internet activities of their children, in order to ensure that no information is collected from a minor without parental consent.

Grievance Redressal

We at Haqdarshak value the trust placed upon us and strive to offer the best experience to User. We endeavour to resolve customer grievances in a timely and efficient manner, while treating our customers fairly and courteously.

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

The name and contact details of the Grievance Officer is Aniket Doegar.

Governing Law / Dispute Resolution

This Policy shall be governed by and construed in accordance with the laws of the Republic of India and subject to the provisions of arbitration set out herein, the courts at Bangalore shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.



If any dispute arises between Haqdarshak and the User in connection with or arising out of the validity, interpretation, implementation or alleged breach of any provision of the Policy, such dispute shall be referred to and finally resolved by arbitration in accordance with the Indian Arbitration and Conciliation Act, 1996 for the time being in force, which rules are deemed to be incorporated by reference in this clause.

There shall be one (1) arbitrator and the seat of the arbitration shall be Bangalore, India. The language of the arbitration proceedings and of all written decisions and correspondence relating to the arbitration shall be English.

Changes to Policy

In the event Haqdarshak modifies this Policy, the same will be updated on the Platform. The Users are encouraged to periodically review the Platform for the latest information on its privacy practices.

Haqdarshak has made every effort to ensure that the Policy adheres with the applicable laws. The invalidity or unenforceability of any part of this Policy shall not prejudice or affect the validity or enforceability of the remainder of this Policy.

Contact

If you require any information or have any questions regarding the use of your personal information or this Policy, you may write to:

Aniket Doegar
contactus@haqdarshak.com