

# Privacy Policy

## Reimagine Fintech Private Limited

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**YOU MUST CAREFULLY READ THIS PRIVACY POLICY BEFORE USING ANY OF OUR SERVICES**

### 1. INTRODUCTION

Reimagine Fintech Private Limited, and its subsidiaries, affiliates, and group companies (hereinafter collectively referred to as '**Reimagine**'/'**us**'/'**we**'/'**our**') are fully committed to respecting your privacy and we recognize the need for appropriate protection of any personal information and data you share with us.

This Privacy Policy ('**Policy**') highlights our privacy practices and procedures and describes how Reimagine collects, uses, discloses, transfers and deals with personal information/data and sensitive personal information/data of the visitors, users (registered as well as unregistered) and subscribers (hereinafter collectively referred to as '**Users**') of our website [www.reimaginefintech.in](http://www.reimaginefintech.in) and/ or application and all other websites, if any, and Services (*as defined in Terms of Use*) including any associated web-pages, accessed through computer, mobile or any other electronic device, and also information that you provide us while participating in our online surveys, registrations and/or subscriptions or at the time of customer onboarding while availing the products and services provided by Reimagine (hereinafter collectively referred to as '**Website**' or '**Platform**').

For the purposes of this Policy,

- "**you**" , "**your**" shall mean the individual or person who is accessing the Platform;

- “Personal Information” shall mean any information/ data which, directly or indirectly, relates to an individual or person who may be identified or contacted from such information/data or from a combination of a set of such information/data and other information which is in possession of Reimagine collected on the Platform including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. Personal Information includes Sensitive Personal Data or Information;
- **“Sensitive Personal Data or Information”** of a person shall mean such personal information which consists of information relating to (a) Password; (b) Financial information such as bank account or credit card or debit card or other payment instrument details; (c) Physical, physiological and mental health condition; (d) Sexual orientation; (e) Medical records and history; and/ or (f) Biometric information;

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Data or Information for these purposes.

All Users are requested to read and understand this Policy as it has been formulated to safeguard your online privacy. This Policy is incorporated into and subject to the Terms of Use available at [Terms of Use](#). Capitalized terms not defined in this Policy have the meanings given in our Terms of Use available at [Terms of Use](#)

By accessing the Services provided by the Website and submitting Personal Information through our Website and by accepting this Policy and the Terms of Use of use of the Website, you agree to the terms of this Policy and you expressly consent to the collection, use and disclosure of your Personal Information in accordance with this Policy.

This Policy is not intended to override the terms of any contract you have with us, nor any rights you may have under other applicable data privacy laws.

If you read and fully understand this Policy, and remain opposed to our practices, you must immediately leave and discontinue the use of the Website or use of any of our Services.

## **2. PERSONAL INFORMATION WE COLLECT AND PROCESS**

When you use the Platform and/ or register for any of our Services, and/or when you contact us directly by any communication channel, you may provide us Personal Information. We collect and store such Personal Information provided by you from time to time to extend the Services available on the Platform. Our primary goal in doing so is to provide you a safe, efficient, smooth, and customized experience. This allows us to provide you Services and features that most likely meet your personal needs and to customize our Platform to make your experience safer and easier. More importantly, while doing so we collect Personal Information from you that we consider necessary for achieving this purpose.

In general, you can browse the Platform without telling us who you are or revealing any Personal Information about yourself. However, once you give us your Personal Information by accessing certain Services on our Platform, you are no longer anonymous to us. Where possible, we indicate which fields are required and which fields are optional for you to choose whether you wish to provide us the information for accessing the Services on the Platform. You always have the option to not provide certain information by choosing not to use a particular Service or feature on the Platform.

- We collect Personal Information from you when you set up a free account with us and/or sign up for alerts on the Platform and/ or seek any information in relation to our Services.
- In relation to our Services, we may also collect Personal Information including Sensitive Personal Data or Information which includes bank account numbers, credit card details and related details to facilitate such Services available on the Platform.
- We may automatically track certain Personal Information about you based upon your behaviour on our Platform. We use this Personal Information to do internal research and analysis to better understand, protect and serve our Users for providing improved experience and value-added services.

- When you use a device to access the Platform, we may also collect technical or other related information from the device as well as the device location.
- We may collect your Personal Information such as name, age, contact details, preferences, and demographic information (like zip code, age, or income level), etc. through optional online surveys, campaigns, and forms, etc. when you choose to participate in these surveys.
- We may receive Personal Information about you from third-party sources, such as: (i) security providers, fraud detection and prevention providers for example to help us screen out users associated with fraud, (ii) social media platforms, when you log-in or sign-up using your social media account, we may receive Personal Information from that service (e.g., your username, basic profile Personal Information) and in some cases, we may collect Personal Information from lead enhancement companies which help us to improve our service offering; and/ or (iii) advertising and marketing partners in order to monitor, manage and measure our ad campaigns.
- We may also monitor your communications with us to ensure compliance with applicable Laws as well as our internal policies. This may include recording (and thereafter storing/archiving) telephone conversations/correspondences between Users and our representatives in relation to the Services provided, for quality control and/or training purposes.
- If you transact with us, we may collect some additional Personal Information, such as a billing address, other payment instrument details and tracking information from cheques or money orders.
- If you choose to post messages on our message boards, chat rooms or other message areas or leave feedback, we will collect that all such information you provide to us. We retain this information as necessary, for instance, to resolve disputes, provide customer support and troubleshoot problems as permitted by law, as permitted by this Policy.
- If you send us personal correspondence, such as emails or letters, or if other Users or third parties send us correspondence about your activities or postings on the Platform, we may collect such information into a file specific to you.

- The Website may contain links to other web sites. Reimagine is not responsible for the privacy practices of such web sites which it does not own, manage, or control.

### **3. USE OF PERSONAL INFORMATION**

Please be assured that we will use your Personal Information in a fair and reasonable manner only and in accordance with this Policy and applicable Laws.

We use your Personal Information for providing you the Services you request on our Platform. Our use of your Personal Information depends on the purpose for which you interact with us and the Service you request. We use and process your Personal Information in the course of providing Services to you including, without limitation, for the following purposes:

- to measure consumer interest in our Products and Services;
- to conduct market research and surveys with the aim of improving our Products and Services;
- to customize your experience and to provide access to desirable content based on your preferences;
- to understand which parts of the Website are visited and how frequently;
- to create your login user ID and to identify you once you register on the Platform;
- to generate business enquires and leads;
- to help us to update, expand and analyze our records to identify new customers;
- to send out communications, notifications, newsletters, and customized mailers etc. to the Users;
- to send you information about new products, services, and special offers. We might tell you about new promotions, features, or updates. These might be third party offers or products we think you might find interesting;
- to reach out to you and respond to your questions, requests, complaints, applications, and entries;
- to contact you about your account or feedback;

- to process job applications received or other career opportunities related requests received through the Platform and to send out job/opportunities' alerts;
- to advertise, market, promote and for publication purposes;
- to inform you about online and offline offers, Products, Services, and updates;
- to provide better usability, troubleshoot problems and site maintenance;
- to protect our Users and providing you with customer support;
- to help promote a safe service;
- to collect money/ Fees;
- to create aggregated statistical data and other aggregated and/or inferred Personal Information, which we or our business partners may use to provide and improve our respective Services;
- to improve your user experience and the overall quality of our Services (in relation to information collected from cookies);
- communications between Users and our representations, for quality control and/or training purposes;
- to prevent, detect, investigate, and protect us against any other illegal activities, suspected fraud and other criminal activity, violations of our Terms of Use, etc.
- to establish, exercise, defend legal rights in connection with any legal disputes (including prospective legal disputes) and for seeking professional legal advice for the purposes of resolving such legal disputes;
- to comply with any applicable Laws and regulations; and/ or
- to help diagnose problems with our server, and to administer our Platform. Your IP address is also used to help identify you and to gather broad demographic information.

#### **4. SHARING OF PERSONAL INFORMATION**

We may share your Personal Information with service providers and others (or otherwise allow them access to it) in the following manners and instances:

- Third Party Service Providers: Reimagine has partnered with a number of selected service providers, whose services and solutions complement, facilitate, and enhance our own. These include hosting and server co-location services, data and cyber security services, billing and payment processing services, domain name registrars, logistic service providers, fraud detection and prevention services, web analytics, monitoring services, session recording and remote access services, performance measurement, data optimization and marketing services, content providers, and our legal and financial advisors (collectively, "**Third Party Service Provider(s)**").

Reimagine may share your Personal Information with Third Party Service Providers for business purpose.

- Law Enforcement, Legal Requests and Duties: Reimagine may disclose or otherwise allow access to your Personal Information pursuant to a legal request, such as a summons, legal proceedings, search warrant or court order, or in compliance with applicable Laws, if we have a good faith belief that the Law requires us to do so, with or without notice to you. Reimagine may also share or disclose, without obtaining your prior written consent, your Personal Information 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.
- Protecting Rights and Safety: Reimagine may share your Personal Information if we believe in good faith that this will help protect the rights, property, or personal safety of Reimagine, any of our Users, or any member of the general public, with or without notice to you.
- Reimagine Subsidiaries and Affiliated Companies: We may share your Personal Information internally within our group companies, for the purposes described in this Policy. We may also share your Personal Information with our employees who we believe reasonably need to know the same to fulfil their jobs to provide, operate, develop, and/or improve our products or services
- In connection with a change in corporate control: In addition, should Reimagine or any of its affiliates undergo any change in control,

including by means of merger, acquisition, or purchase of substantially all of its assets, your Personal Information may be shared with the parties involved in such event.

- Upon your further direction: Reimagine may also share your Personal Information with third parties for other purposes upon your further direction or with your explicit approval.

You authorise Reimagine to exchange, share, part with all information related to the details and transaction history of the Users to its affiliates / banks / financial institutions / credit bureaus / agencies/participation in any telecommunication or electronic clearing network as may be required by Law, customary practice, credit reporting, statistical analysis and credit scoring, verification or risk management or any of the aforesaid purposes and shall not hold Reimagine liable for use or disclosure of this Personal Information.

## **5. Data Transfers**

Your Personal Information collected by us may be transferred to, and stored at, any of our subsidiaries/affiliates/group companies, partners, or service providers, authorized third party agents, or contractors data centers in or outside India, subject to applicable Law. By submitting your Personal Information, you give your consent to such transfers and storage of Personal Information. When we transfer or disclose your Personal Information to other countries, we will protect your Personal Information by appropriate contractual safeguards to ensure that your Personal Information is processed with the highest or same standards of transparency and fairness, as described in this Policy in accordance with applicable Laws.

- Data Localization Obligations: If you reside in a jurisdiction that imposes “data localization” or “data residency” obligations (i.e., requiring that Personal Information of its residents be kept within the territorial boundaries of such jurisdiction), and this fact comes to our attention, we may maintain your Personal Information within such territorial boundaries, if we are legally obligated to do so.

You acknowledge that while doing so, we may continue to collect, store, and use your Personal Information elsewhere, including in India, as explained above.

## **6. Consent**

By merely visiting and using the Platform and/or by submitting your Personal Information, you expressly consent to be bound by the contents and terms of this Policy and for the collection/ use/sharing and disclosure of your Personal Information, in accordance with this Policy. If you do not agree please do not use or access our Platform.

You have the right at any point of time to withdraw your consent to the processing of your Personal Information by informing us in writing (*which includes electronic form*). On withdrawal of your consent, your contract with Reimagine shall come to an end as per the terms agreed between us. However, please note that if you withdraw consent to process Personal Information as above, we may discontinue providing you with our Services through the Platform.

## **7. Access, updating, correction and amendment of Personal Information**

Users may review, access, update, correct or amend your Personal Information that we hold, including your profile and preferences in accordance with applicable Laws. You may do so in the corresponding sections where such information was provided in the first place or by logging into your account on the Platform. The requested changes may take reasonable time due to verification process and cache policies. If you have difficulty in updating/amending or accessing your Personal Information as stated above, please reach out to us.

## **8. Retention of Personal Information**

Your Personal Information will not be retained by Reimagine any longer than it is necessary for the purposes for which the Personal Information is collected and processed and/or in accordance with legal, regulatory, contractual, or statutory obligations as applicable. At the expiry of such period, your Personal Information will be deleted or archived in compliance with applicable Laws.

We may continue to retain your Personal Information after you deactivate your account and/or cease to use any particular Services, as reasonably necessary to comply with our legal obligations, to resolve disputes regarding our Users, prevent fraud and abuse, enforce our agreements and/or protect our legitimate interests.

Further, please note that permanently deleting your account erases most of your Personal Information from Reimagine's databases; provided that Reimagine may retain some Personal Information for compliance with applicable law and for audit and internal compliance purposes. After completing this process, you can no longer use any Services or your account.

## **9. Security Precautions**

Reimagine adopts reasonable and appropriate security practices and procedures in compliance with applicable Laws, which includes managerial, administrative, operational, physical, and technical security control measures in order to safeguard and protect your Personal Information and to prevent loss, unauthorized use, misuse, and alteration of the information under our control and to maintain data accuracy and ensure proper use of information we receive. Once your Personal Information is in our possession, we adhere to strict security guidelines and continuously strive to protect the information against unauthorized access or misuse, though it must be noted at the same time that no data transmission over the Internet can be guaranteed to be fully secure.

We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and third party services for further enhancing the security of our Services and protection of our visitors' and Users' privacy.

Regardless of the measures and efforts taken by Reimagine, we cannot and do not guarantee the absolute protection and security of your Personal Information or any other information you upload, publish, or otherwise share with Reimagine or anyone else. We encourage you to set strong passwords for your account and avoid providing us or anyone with any Sensitive Personal Data or Information of which you believe its disclosure could cause you substantial or irreparable harm.

Furthermore, because certain areas on our Services are less secure than others (for example, if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any Personal Information on any of these areas or via any of these methods.

We further recommend you not to disclose password of your email address, online bank transaction and other important credentials to our representatives, as we do not ask for the same. In addition, we recommend that registered Users do not share their Platform's login password and also sign out of their account when they have completed their work, to prevent unauthorised access, in the event User shares the computer with another person or is using a computer in a public place. Whenever you change or access your account information, we offer you the use of a secure server.

## **10. Changes in Policy and Interpretation**

Reimagine reserves the right to update, change or modify this Policy at any time. The Policy shall come into effect from the date of publication of such update, change or modification. To make sure you are aware of any changes, please check and review this Policy periodically.

This Policy was written in English and may be translated into other languages for your convenience. You may access and view other language versions by changing your Reimagine Website language settings. If a translated (non-English) version of this Privacy Policy conflicts in any way with its English version, the provisions of the English version shall prevail.

## **11. Use of Cookies**

We use cookies (i.e., text files containing small amounts of information) and other similar technologies ("Cookies") in order for us to provide our Services and ensure that it performs properly, to analyze our performance and marketing activities, and to personalize your experience.

You can learn more about how we use and how you can exercise control over them in our Cookie policy by following this [link](#).

Most browsers allow you to control Cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a Cookie, or you may choose to block Cookies with your browser.

## **12. Disclaimer**

We do not store any account related information or any credit / debit card details and shall not be liable for any loss or damage sustained by Users as a result of any disclosure (inadvertent or otherwise) of any information concerning the Users' account, credit cards or debit cards in the course of any online transactions or payments made for any products and/or services offered through the Platform.

In case any Personal Information is shared by you with Reimagine, which is not requested by Reimagine during registration, (whether mandatorily or optionally), Reimagine will not be liable for any information security breach or disclosure in relation to such information. If you have any questions regarding this Policy or the protection of your Personal Information, please reach out to our Reimagine's Grievance Officer (details mentioned below).

### **13. Grievance Officer**

Please see below the contact details of Reimagine's Grievance officer:

Name: Vishal Khanna

Email address: [info@reimaginefintech.in](mailto:info@reimaginefintech.in)

You may also reach out to us for any other questions at our email.