Privacy Policy

Version 1.1

Aurionpro Payment Solutions Private Limited.

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1. Background

1.1. This privacy policy ("**Privacy Policy**") governs the Personal Information (*defined below*) that maybe collected, received, possessed, stored, dealt or handled by AuroPay (*defined below*) in the course of providing its services or availing services from any third party or person, whether in physical or electronic mode including through this website.

1.2. **"AuroPay"** is the trademark of Aurionpro Payment Solutions Private Limited, a private limited company incorporated in India under the provisions of the Companies Act, 2013, having its registered office at **1st Floor, R270, Synergia IT Park, MIDC, Rabale, Navi Mumbai, Maharashtra 400701** with CIN No. U72900MH2021PTC364601 **("APSPL", "the Company", "AuroPay", "we", "us", "our")**

1.3. This Privacy Policy applies to everyone who visits and/or uses our platforms, including employees and / or third parties ("collectively referred to as, "**you**"). This Privacy Policy does not extend to any websites or applications that may be accessed from the Website and/or Apps including, but not limited to any links we may provide to any other websites or applications.

1.4. We are committed to treating data privacy seriously. It is important that you know exactly what we do with your Personal Information. The Privacy Policy sets out basic principles followed by AuroPay for collecting, using, storing, disclosing, and protecting Information in compliance with applicable Laws.

2. User Consent

2.1. By using this site i.e., www.auropay.net or availing any of Our services and/ or by providing your Information, you agree and consent to us collecting, storing, processing, transferring, using and sharing of your Personal Information for the purposes set out and in accordance with this Privacy Policy. If you do not agree or are not comfortable with any term of this Privacy statement then, you may choose not to submit such data through the website. Your choice will not affect your ability to access the website's publicly available content or any offline services AuroPay may offer.-. We reserve the right, to modify this Privacy Policy at any time.

3. What Information is collected, handled or dealt by AuroPay?

3.1. Personal Information:

AuroPay collect the Personal Information that is necessary for AuroPay to provide services or avail any services under a lawful contract or through use of this website.

3.1.1 'Personal Information' or 'Personal Data' shall have the same meaning as defined under the applicable Indian laws and regulations including without limitations the Information Technology Act 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011,

Directions under sub-section (6) of Section 70B of the Information Technology Act, 2000 relating to Information Security Practices, Procedure, Prevention, Response and Reporting of Cyber Incidents for Safe & Trusted Internet dated 28 April 2022, (Indian) Digital Personal Data Protection Act, 2023 or such other applicable laws as may be notified, amended, re-enacted from time to time ("**Applicable Law**").

3.1.2 'Personal Information' or 'Information' means any data about an individual who is identifiable by or in relation to such data. When anonymous information is directly or indirectly associated with personal information, the resulting information also is treated as personal information. AuroPay respects the privacy of the users of its services they use and its service providers and is committed to reasonably protect it in all respects. The information collected by the Company include:

a) Information supplied by users and service providers;

b) Information automatically tracked while navigation of the Company's website;

c) Inferred information through usage and log data;

d) Information collected from any other sources (like third party providers or social media platforms)

e) Information supplied by users, service providers:

i. We may collect personal information when you use our services, this site or provide it by writing to us through our complaint or grievance redressal process or while availing service from service providers. We do not collect such Personal Information from you, otherwise. Personal Information that we collect may include

- Name
- Gender
- Mobile Number
- Email Address
- IP Address

ii. Please keep in mind that when you provide Information to us on a third-party site or platform (for example, via our website or applications like social media login (for e.g. facebook, google etc.) the information we collect is through those third-party sites linked with our websites and applications and is covered under this privacy policy, and the information the third-party site or platform collects is subject to the respective third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our websites or applications. Please also bear in mind that our websites and applications may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our websites or applications to read the privacy policies of other sites, as they may collect your personal information.

f) Information automatically collected/tracked while navigation.

i. We use Cookies or similar electronic tools to improve the responsiveness of the site for our users, to collect information to assign each visitor a unique,

random number as a User Identification (User ID) to understand the user's individual interests using the identified computer. Detailed Information on use of cookies is given below. Unless you voluntarily identify yourself (through registration, for example), we will have no way of knowing who you are, even if we assign a cookie to your computer. The only personal information a cookie can contain is information you supply. A cookie cannot read data off your hard drive. We receive and store certain types of information whenever you interact with us via the Site.

ii. For more information on Cookies, please see below.

g) Information we collect from third parties.

i. We may receive information about you from other sources, add it to our account information and treat it in accordance with this Privacy Policy. If you provide information to the platform provider or other partner, whom we provide services, your account information and order information may be passed on to us. We may obtain updated contact information from third parties in order to correct our records and fulfil the Services or to communicate with you.

h) We do not provide any personally identifiable information to third party websites / advertisers / ad-servers without your consent. Third Party advertisers may use information (not including your name, address, email address or telephone number or other personally identifiable information) about your visits to our and other websites or application, in order to provide advertisements about goods and services of interest to you. Any personally identifiable information provided by you will not be considered as sensitive if it is freely available and / or accessible in the public domain like any comments, messages, blogs, scribbles available on social platforms like Facebook, twitter etc.

3.1.3 AuroPay may engage service providers to undertake any activities, operations or provide any goods or services on behalf of AuroPay or administer activities on AuroPay's behalf, such as sending out newsletters or surveys.

3.1.4 AuroPay may from time to time employ service providers to perform functions on AuroPay's behalf, such sending e-mail message communications and providing data analysis services, within or outside India.

3.1.5 For necessary business purposes, Personal Information may also be shared internationally in accordance with Applicable Law.

3.1.6 AuroPay are not responsible for examining or evaluating, and do not warrant the offerings of, any businesses or individuals or the content of the Service Provider's websites. AuroPay does not assume any responsibility or liability for the actions, products, services, and content of any other service providers. Service providers and Employees should carefully review the legal statements and other conditions of use of any website which they access through a link from AuroPay's website. Service providers and Employees linking to any other off-site websites are at their own risk.

3.1.7 AuroPay may share the Personal Information with other entities affiliated with AuroPay for internal reasons, primarily for business and operational purposes.

3.2. Sensitive Personal Information: means any Personal Information of an individual, which consists of information relating to financial information such as bank account, credit card, debit card or other payment instrument details; passwords; biometric

information; sexual orientation and medical records and history. Information freely available or accessible in public domain is not treated as Sensitive Personal Information. Depending on who you are (e.g., a merchant, customer, cardholder, consumer, supplier or business partner) and how you interact with us (e.g., telephone, IVR, API, online or offline), we may collect, use, receive, store, analyze, combine, transfer or otherwise process different categories of your Personal Information (including Sensitive Personal Information).

3.3. Non-Personal Information:

3.3.1 means information that does not exclusively identify you but is related to you nonetheless such as, information about your interests, statistical or demographic data and use of the sites.

3.3.2 As a matter of principle, we do not collect certain special categories of Personal Information about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health or any genetic and biometric information).

3.3.3 To the extent the Websites, Apps or Platforms include links to third-party websites, plug-ins and applications (including cookies, tracking technologies 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. The Company does not have oversight of these third-party websites, plug-ins and applications and we are not responsible for their processing or using of your Personal Information or Sensitive Personal Information. Any information collected by a third party in this manner is subject to that third party's own data collection, use and disclosure policies and you must make yourselves conversant with those.

3.3.4 We may automatically track certain information about you based upon your behaviour on the Website such as the URL clicked, your IP address etc. We use this information to do internal research on our user's demographics, interests, and behaviour to better understand, protect and serve our users.

4. How does AuroPay use the collected/received Information?

4.1. We will only collect and process Personal Information about you in a legal and lawful manner. We use information to provide, analyse, administer, enhance and personalize our service and marketing efforts, to process your registration, to provide you services, and to communicate with you related to below mentioned points.

4.2. We may use information for the following purposes:

a) to fulfil our obligations and to to contact you if a problem arises with respect to the services.

b) to notify you, if you provide your contact details through our contact form, about our updates and information that may be of interest to you. If you no longer wish to receive these notifications you can opt out at any time through our contact form or by sending us an e-mail at privacy@auropay.net

c) to occasionally ask you to participate in one of our surveys or contests or to ask you to provide feedback to us relating to our services.

d) to improve the user experience on our website through the use of cookies and data analytics, including artificial intelligence and machine learning tools to analyze usage patterns and optimize our services.

e) to send out emailers with respect to our activities;

f) Marketing

i. In relation to the products and services provided by us or our business partners or affiliates with whom we share your Personal Information (including Sensitive Personal Information) as per this Privacy Policy, you may receive marketing communications by messages, SMS email, or through other digital modes, on the Platforms, Websites and Apps or other platforms including social media platforms.

ii. The provision of such marketing activities shall be in accordance with the applicable laws of India. For marketing activities done by us, we keep a record of marketing and communication information. You are entitled to opt out from receiving such marketing communications by writing to us at privacy@auropay.net.

AuroPay may also use Marketing and Communications Information in order to improve and customize the content of any ads, promotions and advertising that may be of interest to you.

4.3. AuroPay o may share your Information with any third party without obtaining the prior consent:

i. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences, or to Government Authorities, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing these terms or for complying with the Applicable Law and regulations.

ii. We propose to share such information within its group companies and officers and employees of such group companies and our affiliates for the purpose of processing personal information (including sensitive personal information) on its behalf for provisioning of the services for which such Information was provided. We also ensure that these recipients of such information agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

4.4. In case you choose to decline to submit personally identifiable information on the Site, we may not be able to provide the services to you. In any case, we will not be liable and or responsible for the denial of certain services to you for lack of you providing the necessary personal information.

5. How do We protect your Information?

AuroPay implements reasonable security practices and procedures governed under the Data Protection Policy of AuroPay that contains managerial, technical, operational and physical security control measures that are commensurate with the Personal Information being collected, received, possessed, stored, dealt or handled and the nature of AuroPay business. AuroPay adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of Personal Information. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. And, of course, any information you include in a posting to the discussion areas is available to anyone with Internet access.

6. Purposes for Processing Personal Information

We process your Personal Information (including Sensitive Personal Information) for the purposes mentioned below:

6.1 To verify, authenticate and authorize your use of our products or services, we process your Personal Information (including Sensitive Personal Information) for creating login credentials or establishing an account-based relationship, doing KYC evaluation and risk assessments etc.;

6.2 To process payment transactions subject to product specific service terms (contracts) and legal obligations;

6.3 To provide you products or services being offered by us, our group companies or our business partners with the intent of improving and expediting your transaction processing journey on the Platforms, Websites, Apps, merchant platforms, etc.;

6.4 To do internal risk assessments and analysis for improve our services, reduce fraud rates, build risk models, etc.;

6.5 To generate variables, affluence and reliability scores and use the same internally;

6.6 To meet the requirements of applicable laws, regulations, standards, rules, and codes with which AuroPay Payments must comply;

6.7 To manage our relationship with you;

6.8 To market our products and services including products and services of our business partners and /or our group entities and to notify you about events, offers, sponsorships, marketing programmes and similar marketing campaigns;

6.9 To conduct research and to develop and improve our products and services.

7. Children’s Privacy

This website is not intentionally designed for or directed at persons who are considered as major (as per Applicable Law in the respective territories). AuroPay does not knowingly permit -minors to provide any other personally identifying information. If AuroPay becomes aware that any personally identifiable information of person who has not attained the necessary legal age (as per Applicable Law in the respective territories) has been collected on Our services without verified parental consent, then AuroPay will take the appropriate steps to delete any such information and notify the parent of such person. We do not actively collect personal information from website visitors. However, parents should monitor their children's use of our website. Nevertheless, it is our policy

not to collect and process any Personal Information from children below necessary legal age or offer to send any promotional materials to persons in that category. AuroPay does not seek or intend to seek or receive any Personal Information from children. This website is informational in nature and does not collect Personal Information. However, if you believe any personal information has been inadvertently submitted, please contact us for immediate removal. Information is removed from our site/services.

8. Does AuroPay retain any Personal Information?

AuroPay will retain Personal Information as long as necessary for the legitimate business interests of AuroPay to support service providers and Employees and for AuroPay to comply with its legal obligations or perform a lawful contract. At the end of purpose fulfilment, AuroPay will take reasonable efforts to erase Personal Information. However, AuroPay may:

a) still retain some of Personal Information as necessary for AuroPay legitimate business interests, such as human resource documentation, employee records, fraud detection, prevention and enhancing security and safety.

b) still retain and use Personal Information of service providers and Employees to the extent necessary to comply with AuroPay's legal obligations. For example, AuroPay may keep some information for taxing, legal reporting and auditing obligations.

9. Security Information

9.1 The security of your Personal Information (including Sensitive Personal Information) is important to us. To protect against the loss, misuse and alteration of the information under our control, the Company has in place appropriate physical, technical, operational and managerial procedures. In addition, AuroPay Payments follows the payments industry standards regarding the protection of payment card information. We conduct regular audits to maintain the appropriate level of security certification with the Payments Card Information Security Standard Council (PCI) in respect of protecting card data. For example, the Company servers are accessible only to authorized personnel and your information is shared with employees and authorized personnel on a need to know basis to complete the transaction and to provide the services requested by you.

9.2 The Company also regularly reviews its policies regarding the collection, storage, using and processing of your Personal Information (including Sensitive Personal Information), including physical security measures, preventing alteration, loss, query, use or fraudulent or unauthorized access of your Personal Information (including Sensitive Personal Information).

9.3 Although the Company endeavours to safeguard the confidentiality of your personally identifiable information, transmissions made by means of the Internet cannot be made absolutely secure. You hereby acknowledge that the Company is not responsible for any intercepted information sent via the internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

10. User control over collected data

10.1. You may withdraw your consent regarding use of your Personal Information at any time by sending an email to AuroPay on privacy@auropay.net for the same. AuroPay shall review the request to withdraw and may ask to verify if the withdrawal is for Personal Information. Post verification AuroPay will withdraw the consent for which request was

made and stop any further handling or dealing of Personal Information. You may also write to use to correct any inaccurate or incomplete information provided to Us. While We may comply with your request to edit or delete your information AuroPay may maintain backup copies of such information, to the extent necessary to comply with our legal obligations.

11. Grievance Redressal Officer

11.1. If you have any grievances about handling or dealing of your Information you may contact AuroPay grievance redressal officer with respect to data protection and privacy related complaints.

11.2. Chief Information Security Officer (CISO) of AuroPay

Name: Girish Kulkarni

Email Id: girish.kulkarni@aurionpro.com

11.3. We request you to please provide the following information in your email:

a) Identification of the information provided by you;

b) Clear statement as to whether the information is personal information;

c) Your address, telephone number or e-mail address;

d) A statement that you have a good-faith belief that the information has been processed incorrectly or disclosed without authorization, as the case may be;

e) A statement, under penalty of perjury, that the information in the notice is accurate, and that the information being complained about belongs to you;

12. Need to Know

12.1. AuroPay DOES NOT solicit confidential details like your OTP/CVV/PIN/Card Number/ Bank account details through any means.

12.2. AuroPay never call users/customers with offers, discounts on products and offering free gifts.

12.3. Scamsters/fraudsters attempt various techniques such as ‘phishing’, to contact, influence and defraud users. Please do not share any personal or payment sensitive information with unknown persons as such sharing leads to unauthorized use and/or fraud and consequent financial loss.

12.4. AuroPay shall not be liable for any loss, damage, expense incurred by a user, service provider or a customer where you have shared personal and/or payment sensitive information with scamsters/fraudsters who may be misrepresenting or impersonating Us.

12.5. We also request and encourage you to report such attempts or incidents to our Grievance officer to enable us to investigate and explore legal recourse.