



PSB ALLIANCE PVT.LTD

Privacy Policy

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1. Preamble

This Privacy Policy describes about the privacy rights of Customer, Service Providers, BC and their Agents (“You” or “Your”) regarding the manner of collection, use, storage, sharing and protection of your Personal Information and its security. The top priority of the PSB ALLIANCE PVT.LTD Limited (herein after referred as “Company”) is to keep “Your” personal Information secure and use it solely for the activities related to Company, thereof, preventing any misuse.

2. Consent

“You” accept this Privacy Policy when “You” sign up for, access, or use Company’s products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively “Company Services”). Company may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date.

3. Applicability

This policy is applicable to Personal Information collected by Company directly from the customers, merchants, agents and /or holding/ultimate holding and/or subsidiary companies and/or group companies and/or its affiliates and/or partners and/or third-party service providers (“affiliates”) and/or through Company’s mobile application and/or other electronic communication and/or also any information collected by the Company server from the customer’s browser.

4. Personal Information

During course of “Your” association with Company, Company will collect and store “Your” Personal Information. Personal Information shall mean information that could reasonably be used to identify “You” personally. This includes, but not limited to the following (“Personal Information”):

- a) Information which “You” may provide during the registration process such as Name, Phone Number, Email Address, Communication or Permanent Address;
- b) Photograph and/or any other personal document provided during registration or during the profile update such as proof of identity, proof of address;
- c) Transactions performed and related information which can identify “You” as an individual through your customer ID or other relevant unique identifier;
- d) IP Addresses;
- e) Access Information about “Your” actual location using third party services which may include accessing “Your” location, IP address, GPS location etc.
- f) Media Access Control address;
- g) Device specific information or identifiers such as IMEI, OS specific identifiers;
- h) Usage logs/ Server logs/ Cookies having Personal Information and Sensitive Personal Information;

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- i) Any other sensitive personal data, information such as
 1. Passwords.
 2. Financial information, such as details of company account, credit card, debit card, or other payment instrument details, financial transactions etc.
 3. Biometric information

This information can be in electronic or physical format.

Any comments, messages, feedback, complaints blogs, scribbles etc. posted /uploaded /conveyed /communicated by you on the public sections of the application becomes published content and is not considered Personal Information subject to this Policy.

5. Use of Personal Information

Company values the trust “You” place in Company, and hence insist upon the highest level of protection for securing your Personal Information with Company. Company may use “Your” Personal Information for:

- (a) Verification of your identity, access, privileges assigned in relation to your account and any other services you may avail from the Company;
- (b) Provisioning of products/services, testing or improvement of services, recommending various products or services of the Company to you, including that of affiliates of Company;
- (c) Processing your requests, transactions, enquiries and complaints, customer services and related activities;
- (d) Communicating to you about bills, invoices, existing or new offers, content, advertisements, surveys, key policies or other administrative information of the Company;
- (e) Analytics and reviews for improvement of the product/services;
- (f) Improving your experience while using the application by presenting advertising, products and offers tailored to you;
- (g) Ensuring adherence to legal and regulatory requirements

6. Disclosure

- a) Company and its affiliates do not sell or rent Personal Information to any third-party entities.
- b) In a scenario where Company or Company’s assets are merged or acquired by any other entities, or during restructuring of business or re-organization, Company may share Personal Information provided by you to such business entities. If any such an event occurs the other business entity or the newly combined business entity will ensure safeguarding of your Personal Information.
- c) Company engages a number of vendors, consultants, contractors and take support from its affiliates for providing services to the customers, and agents. Company may provide limited access of your information to such partners to enable them to provide the services subscribed by you.
- d) Company’s affiliates and their employees operate under a contract and strict security & confidentiality restrictions. Company takes adequate measures to ensure that Company’s affiliates adopt appropriate level of security practices and procedures to ensure security of your Personal Information.
- e) Company may share your Personal Information with government/government authorities or agencies/ legal / regulatory authorities for any investigation or to comply with legal process or in response to a request by any of these authorities or to enforce applicable

terms and conditions or to protect Company, Company's users and affiliates rights, privacy, safety or property.

- f) The Personal Information, provided by you, may be shared with Company's affiliates to help to detect and prevent identity theft, frauds and other illegal activities; correlate or map related accounts to prevent misuse of Company Services and to provide you service.

7. Information Security and Storage

- a) Company has adopted reasonable security practices and procedures, in line with international standards and applicable laws, to include strategic, operational, managerial, technical and physical security controls to safeguard and protect your Personal Information against unauthorized access and unlawful interception. Additionally, Company has adopted measures to ensure that your Personal Information is accessible to Company employees or affiliate's employees strictly on the 'need to know' basis.
- b) Company applications/website has industry standard security precautions in place to protect the loss, misuse and alteration of your Personal Information with Company. Whenever you change or access your account information, Company will facilitate the use of a secure server. Company applies encryption or other appropriate security controls to protect your Personal Information when stored or transmitted by Company.
- c) Company has taken appropriate steps for the security and protection of all our digital platforms including internal applications, however, Company shall not be responsible for any breach of security or the disclosure of Personal Information by the customers and/or merchant itself or for reasons outside Company's control.
- d) Company shall not be responsible to keep the Personal Information confidential once it is shared by Company with regulator or legal authorities on their request/mandate or as per the applicable laws and regulation.

8. Third Party Websites, Applications and Services

The Company's Application/websites/mobile app or any online platform may include links to other websites/applications. Such websites/ application is governed by third party operator's privacy policies, which are beyond Company's control and the Company will not be responsible for their privacy practices or the content.

9. Updating of Personal Information

You shall be responsible to ensure that the information or data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consents to provide such information or data.

This Policy should be read in conjunction with Terms & Conditions/agreement applicable for availing company's services accepted by you. Registration or usage of the company's services implies your express consent and agreement to this Policy. This Policy is subject to modification based on changes in the business, legal and regulatory requirements and will be updated online time to time. You are encouraged to periodically visit this page to review the policy and any changes.

10. Independent Evaluation

The Internal Audit Department shall carry out independent evaluation of IT Policy compliance in accordance with Risk Based Audit Plan as per the frequency decided by Audit Committee.

11. Exception Handling

Procedural exceptions to this Policy within regulatory framework shall be approved by the Head of Risk/ CRO or otherwise specifically delegated. All exceptions must be documented, with the reason for the exception, expiration or review date for the exception and, where necessary, an action plan and timetable for compliance with the Policy. Notice of exceptions granted along with documentation of approval must be provided to the Head of IT, who will maintain a record of all exceptions and submit to the Board level Committee on a quarterly basis for ratification, and shall be placed before the Board for intimation.

12. Policy Review

The policy will be shall be reviewed annually for necessary amendments and updates, or earlier to incorporate the change in business strategy or amendments in applicable regulations impacting the policy. Any revisions to this policy shall be approved by the Board level committee.

13. Associated Policies

Information Security Policy

14. Regulatory References

Guidance Note on Information security, Electronic Banking, Technology risk management and cyber frauds

Abbreviations

BCP	Business Continuity Plan
BYOD	Bring Your Own Device
CA	Certifying Authority
CCRO	Chief Compliance and Risk Officer
CERT-IN	The Indian Computer Emergency Response Team
CISO	Chief Information Security Officer
CMP	Certificate Management Protocol
DBMS	Database Management System
DR	Disaster Recovery
DRP	Disaster Recovery Plan
GPS	Global Positioning System
IDRBT	Institute for Development and Research in Banking Technology
IMEI	International Mobile Equipment Identity
IP Address	Internet Protocol Address
IPF	Information Processing Facility
IS	Information Systems
ISG	Information Systems Group
ISSC	Information Security Steering Committee
IT	Information Technology
MBSS	Minimum Baseline Security Standard
MEITY	Ministry of Electronics and Information Technology
MIS	Management Information System
NCIIPC	National Critical Information Infrastructure Protection Centre
OEM	Original Equipment Manufacturer
OLA	Operational Level Agreement
OS	Operating System
PKI	Public Key Infrastructure
PSBA	PSB Alliance
RAC	Real Application Cluster
RBI	Reserve Bank of India
RMC	Resource Monitoring and Control
SLA	Service Level Agreement
SOC	Security operations center