

PRIVACY POLICY FOR WWW.MYKYCBANK.COM

This policy (hereinafter referred to as “**Privacy Policy**”) is effective as of September 21, 2019 and is to inform you regarding the storage, handling, processing, collection and usage of the Personal Information (including without limitation, any information relating to an identified or identifiable natural person such as your name, phone number, email address, address proof, tax related identification number, and such other information and/or data based on which We can identify You and/or any information and/or data related to You) by The G&J KYC Information Centre (hereinafter referred to as “**GJKIC**”), which is collected during your visit to and/or use of our website www.mykycbank.com (hereinafter referred to as the “**Website**”). GJKIC is a not for profit company, incorporated under the laws of India, with registered office at AW 1010, Tower A, Bharat Diamond Bourse, G Block, Bandra-Kurla Complex, Bandra - East, Mumbai – 400051, India. GJKIC can be contacted by e-mail: info@mykycbank.com.

It is clarified that under the General Data Protection Regulations, GJKIC qualifies as a ‘data controller’, which means they decide themselves the kind of personal data they process, for which purpose and which technology they use to process the data.

For the purpose of this Privacy Policy, wherever the context requires, the terms “you”, “your” or “User”, shall mean any natural person and/or any natural person authorised by a legal person who has agreed to visit and access the Website anonymously or agreed to provide his/ her Personal Information by registering on the Website. The terms “we”, “us”, “our”, appearing in this Privacy Policy shall mean and refer to GJKIC and the owners and proprietors of the trademark mykycbank.com and the domain name mykycbank.com.

Please read this Privacy Policy carefully. By clicking on “I agree” or ticking the relevant box, You acknowledge having read and accepted this Privacy Policy and consent to the processing of your Personal Information by GJKIC as described in this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the Website or the services offered on the same. You may withdraw your consent at any time, without affecting the lawfulness of the processing by GJKIC based on the consent, before your withdrawal and also thereafter, as far as another legal basis for processing applies: the processing of your Personal Information (including storage of your Personal Information in the GJKIC database) may also be based on legal obligations (e.g. Know your customer regulations, anti-money laundering legislation, rules regarding terrorist financing) or based on the necessity with a view to our or another individual’s legitimate interest. In case you do not consent or do not provide Us with requested Personal Information, We will not be able to provide you the services as described in this Privacy Policy.

In case you provide GJKIC with Personal Information of natural persons or legal persons whom you represent (e.g. employees or self-employed with whom you entered into a cooperation agreement), you hereby agree and confirm that you will communicate this Privacy Policy to such persons and will ask for their

voluntary consent thereto, before providing us with any of their Personal Information.

1. We respect the User's privacy and we recognize the need to protect the Personal Information which the User shares with us. We would like to assure the User that we follow appropriate and necessary standards and will protect the User's Personal Information in accordance with the Information Technology Act, 2000, as amended from time to time, the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 and any other applicable data protection legislation ("**Rules**").
2. By agreeing to this Privacy Policy, the User agrees to the collection, storage, handling, processing and use of the User's Personal Information, which includes without limitation the following:
 - (i) Password;
 - (ii) Financial information such as details relating to the bank account or credit card or debit card; and
 - (iii) Personal identifiable information, such as the User's name, registered address or email address, information relating to your ultimate beneficial owner/ director/ partner/ representative, citizenship, the telephone number and such other information which may help us identify you.
 - (iv) Any other voluntary information regarding the user which facility the platform may offer to help share with their connections.
3. We shall use your Personal Information for the following purposes: (i) offering Our services to you as described in this Privacy Policy and/or our Terms of Use and/or in any other document related to the Website, such as making some and/or all parts of your profile on the Website available for viewing by the other members of the Website as mentioned in Point 4 and 5 below. Note, that unless you give your express consent by accepting another registered member's request on the Website or as consented through your privacy settings on the Website, your full profile, documents and information will not be available for accessing to the other registered members. (ii) perform customer due diligence, (iii) make your Personal Information available for anti-money laundering purposes, (iv) monitor transactions where applicable, and/or (v) comply with Our legal obligations, such as know-your customer ("KYC") legislations, anti-money laundering legislations, rules regarding terrorist financing.
4. Notwithstanding anything to the contrary contained in this Privacy Policy, You may be subject to the establishment of an automatic connection with a specific category of registered members of the Website, as detailed in the Terms of use available on our Website at <https://www.mykycbank.com/TermsAndConditions.html> ("Terms and Conditions"). You explicitly consent to the sharing of Your Information to all Your connections in this regard and disclaim any and all liabilities against GJKIC.
5. Your privacy settings will control how Your Information is to be shared with other categories of industry stakeholders ("**Indirect Industry Users**") including without limitation banks, financial institutions, regulatory authorities, insurance companies etc. who are not directly connected to you, but are

connected to your connections on the Website. You explicitly consent to share your KYC Information to other industry stakeholders based on either the default privacy setting or the option specifically selected by You for every specific category of industry stakeholders.

6. GJKIC shall permit its Users to review the Personal Information provided by the User and it shall be the User's obligation to maintain and promptly update the Personal Information provided by the User to keep it true, accurate, current and complete. If the User provides any information that is untrue, inaccurate, not up-to-date or is incomplete or in respect of which, GJKIC has reasonable grounds to suspect that the Personal Information or any part thereof is untrue, inaccurate, not up-to-date or incomplete, then GJKIC shall not be responsible for authenticity of any such data/ information provided by User. Further, on our Website, we may have links to the websites of other third parties. These third-party websites may collect personal information about the Users on those respective websites, and our Privacy Policy does not extend to these external websites and third parties. We recommend that you refer directly to these third parties and their respective web sites regarding their privacy policies, especially when submitting any Personal Information to such websites since we will not be responsible for the privacy policies and practices of these other websites.

7. The service provided by GJKIC covers sharing of limited and complete Personal Information with other users registered on our portal by sending and accepting a connection request. On initial acceptance of a connection, a user can view limited Basic KYC Profile of another user (which Basic KYC Profile contains information such as Company information, name of the directors and owners, beneficial ownership of the owners, Name and address of proprietorship/ partnership firm/ Company, details of turnover range, bank information, details of branch offices and external findings such as details of associate companies, credit rating, without supporting documents) and for viewing complete KYC Information of another user along with supporting KYC documents, user may need to send another connection request. GJKIC does not take responsibility for or control the information provided by you to other users which is made available on the Website post connection acceptance. Please use caution and practice safe trading when using the Website.

8. We, either by ourselves or through third party service providers track the internet protocol ("**IP**") address from which the User visits us/our Websites and analyse this data for trends and statistics independently and/or for helpdesk services. We will not identify the individual User based on their IP-address. We use the information we automatically receive from the User's web browser to see which pages the User visits within our Website, which websites the User has visited before coming to ours, and where the User goes after leaving the Website. We, either by ourselves or through third party service providers develop statistics that are helpful to understand how our Users can use this Website. We use this information in the aggregate to measure the use of our Website and to administer and improve our Website. This statistical data is interpreted by us in its continuing effort to present the Website content that visitors are seeking in a format they find most helpful. The data provided by the User shall be retained

by GJKIC as per the laws of jurisdiction of the User's country from which the data is collected and stored.

9. Some of our web pages including our third-party service providers store and use "cookies" so that we can serve the User better, with customized information when the User returns to our Website. We only use technical cookies. Cookies are identifiers that a web site can send to the User's browser to keep on User's computer to facilitate User's next visit to our Website. The User can set his / her browser to notify him / her when a cookie is sent, giving the User the option to decide whether or not to accept it. The information we collect and analyse is used to improve our service to the User. The User agrees that we or our third-party service providers can collect the User's IP address or other unique identifier. At times, we also use these identifiers to collect information regarding the frequency with which our guests/ Users visit various parts of our Website. We, either through ourselves or our affiliates or third party service providers or group companies may combine the User's IP address with other personally identifiable information for marketing and for market research purposes, including internal demographic studies, so that we can optimize our products and services and customize this Website for the Users and / or other such purposes as GJKIC may require. You hereby consent with such processing of your Personal Information, which may qualify as profiling.
10. We may combine User's visitor session information or other information collected through cookies, web beacons and other technical methods with the Personal Information provided by the User, in order to understand and improve the User's online experiences and to determine what products, promotions and services the User prefers or is likely to be of interest to the User. You voluntarily consent with such processing of your Personal Information, which may qualify as profiling.
11. We also use these technical methods in HTML e-mails that we send the User for a number of purposes including, to determine whether the User has opened or forwarded those e-mails and/or clicked on links in those e-mails; to customize the display of the banner advertisements and other messages after the User has closed an email; and to determine whether the User has made an enquiry or purchase in response to a particular email.
12. Cookies, web beacons and other technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect and use information on our behalf. The information from use of these technical methods may be collected in a form that identifies the User personally.
13. There are times when we may collect Personal Information from User such as name, email address, citizenship and phone number etc. If the User chooses not to provide the information we request, he/ she can still visit this Website, but User may be unable to access certain options, offers and services. The platform of this Website is an online portal, where KYC information can be updated and uploaded by the User. The data uploaded will be verified by the back-end compliance team of GJKIC after which, the user who becomes a member can share his profile with other members on the platform.

14. We will not sell, trade or disclose to third parties any information derived from the registration for, or use of, any online service (including names and addresses and other data) without the User's consent, save and except as provided in the present Privacy Policy, to any of our affiliates or group companies for helping the User in using the services offered by our Website or other purposes in relation to the businesses of our affiliates or group companies and as may be required by any legal process or in the case of imminent physical harm to any person. Further, GJKIC will allow its affiliates, suppliers, to access the information for purposes of confirming User's registration and providing User with benefits User is entitled to. [If at any point in time User wishes to opt out, the User may withdraw any consent previously given, by written communication or by sending e-mail from registered e-mail address of the User to us]. Upon User's refusal to provide data / information or withdrawal of consent, GJKIC reserves right to refuse to provide and/or discontinue its products and services.
15. We will take appropriate steps to protect the Personal Information the User shares with us. We have implemented technology and security features and strict policy guidelines to safeguard the privacy of the User's Personal Information and other data from unauthorized access and improper use or disclosure. We will continue to enhance our security procedures as new technology becomes available.
16. When the User registers with this Website, the User agrees that we or any of our partners/ affiliate/ group companies/ third party service providers which we may have now or in the future, may contact the User from time to time to provide the offers/ information of such products/ services that we believe may benefit the User, in which case we will require them to honour this Privacy Policy. Also, the User agrees that we may provide information so collected from the User to government authorities/ bodies or any court of law or any tribunals including the Directorate of Information Technology as per the applicable laws of India, or other countries, including under the Information Technology Act, 2000 as amended from time to time and the rules thereunder and/or as per our agreement with our third party service providers or any third party and/or to protect our rights and safety, our Users, personnel or others.
17. We do not share your Personal Information with any third-party advertisers or ad networks for their advertising except for: (i) hashed or device identifiers (to the extent they are personal data in some countries); (ii) with your separate permission (e.g., lead generation form) or (iii) data already visible to any users of the services (e.g. profile). However, if you view or click on an ad on or off our site or apps, the ad provider will get a signal that someone visited the page that displayed the ad, and they may through the use of mechanisms such as cookies determine it is you. Advertising partners can associate Personal Information collected by the advertiser directly from you with our cookies and similar technologies. In such instances, we seek to contractually require such advertising partners to obtain your voluntary, opt-in consent before doing so.
18. We may process and use your Personal Information outside India. The User understands and hereby agrees that, because of the nature of the world wide web, we may transmit the information collected from the User to another country

(including countries outside the European Economic Area), but among our affiliates and group companies or third-party service providers, for purposes necessary for carrying out the processing detailed in this Privacy Policy, or for our business purposes. You are aware of the fact that such transfer of data may entail risks, where the countries in which such Personal Information is processed may have laws which are different than India and may not be as protective of your Personal Information.

19. In case of any questions, complaints and/or grievances with regards to this Privacy Policy, the User may contact Mr. Nayan Chawhan (hereinafter referred to as the “**Grievance Officer**”) at the e-mail address nayan[dot]chawhan[at]mykycbank[dot]com and the Grievance Officer shall make best efforts to expeditiously respond to your questions and/or redress your grievances. You are entitled to request from Us via the Grievance Officer: (a) access to and rectification or erasure of Your Personal Information, (b) restriction of processing or to object to processing, as well as (c) to receive the Personal Information in a structured, commonly used and machine-readable format. You are also entitled to lodge a complaint with the competent supervisory authority.
20. We may make changes to this Privacy Policy, at our sole discretion, from time to time without requiring any consent from anyone. In the process, if we make any substantial changes in the manner in which we utilize, store or share your Personal Information, we will inform you by posting the latest version on this Privacy Policy page. Please check our Privacy Policy on a regular basis. If you do not agree with the changes made to the Privacy Policy, you may not visit and/or use the Website and/or close your account with us.
21. Your use of this Website will be governed by and construed in accordance with the laws of India. The Users agree that any legal action or proceedings arising out of your use may be brought exclusively in the competent courts/ tribunals having jurisdiction in Mumbai in India and irrevocably submit themselves to the jurisdiction of such courts/ tribunals.