

PRIVACY POLICY FOR WWW.MYKYCBANK.COM

This policy (hereinafter referred to as "**Privacy Policy**") is to inform you regarding the collection and usage of the Personal Information (any information relating to an identified or identifiable natural person) by The G&J KYC Information Centre (hereinafter referred to as "**GJKIC**"), which is collected during your visit to and 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 offices at AW 1010, Tower A, G Block, Bharat Diamond Bourse, Bandra-Kurla Complex, Bandra - East, Mumbai - 400 051, India. GJKIC can be contact by e-mail: info <at> mykycbank {dot} com. GJKIC qualifies as data controller.

For the purpose of this Privacy Policy, wherever the context requires, the terms "you", "your" or "User", shall mean any natural or 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 data 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 data (including storage of your personal data in the GJKIC database) may also based on legal obligations (e.g. KYC legislation, AML 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 may not be able to provide you the services as described in this Privacy Policy.

In case you provide GJKIC with personal data of natural persons you represent (e.g. employees or self-employed with whom you entered into a cooperation agreement), you hereby explicitly agree and confirm that you will communicate this Privacy Policy to these persons and will ask for their explicit consent thereto, before providing us with any personal data.

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 and use of the User's Personal Information, which includes the following:
 - (i) Password;
 - (ii) Financial information such as details relating to the bank account or credit card or debit card;
 - (iii) Personally identifiable information being the User's name, physical or email address, citizenship or the telephone number.
- 3. We shall use your Personal Information for the following purposes: (i) offering Our services to you as described in this Privacy Policy or in any other document related to the Website, (ii) perform customer due diligence, (iii) make your Personal information available for anti-money laundering purposes, (iv) monitor transactions, (v) comply with Our legal obligations, such as KYC legislation, AML legislation, rules regarding terrorist financing.
- 4. 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 cannot be made responsible for the privacy policies and practices of these other websites.
- 5. The service provided by GJKIC covers sharing of KYC Information with another user registered on our portal by sending and accepting connection request. On initial acceptance of connection, user can view 1-2 pager KYC profile of another user (which contains only basic profile information without supporting document) and for viewing full profile of another user along with supporting documents, user need to send another connection request. GJKIC cannot 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.
- 6. We track the internet protocol ("**IP**") address from which the User visits us/our Websites and analyse this data for trends and statistics independently and 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 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 user's country from which the data is collected and stored.

- 7. 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 the his / her browser to notify the 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 analyses 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 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 explicitly consent with such processing of your Personal Information, which may qualify as profiling.
- 8. 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 explicitly consent with such processing of your Personal Information, which may qualify as profiling.
- 9. 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.
- 10. 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.
- 11. There are times when we may collect personal information/data 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.
- We will not sell, trade or disclose to third parties any information derived 12. 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. Upon User's refusal to provide data /information or withdrawal of consent GJKIC reserves right to refuse to provide or discontinue its products and services.
- 13. 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.
- 14. When the User registers with this Website, the User agrees that we or any of our partners/ affiliate/ group companies/third party service providers may contact the User from time to time to provide the offers/ information of such products/ services that we believe may benefit the User. 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 the Information Technology Act 2000, as amended from time to time and the rules thereunder or as per our agreement with our third party service providers or any third party.
- 15. The User understands and explicitly agrees that, because of the nature of the Internet, 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 business purposes. You are aware of the fact that such transfer of data may entail risks, where some countries may only guarantee a lower degree of protection of personal data.
- 16. In case of any complaint or grievance with regards to this Privacy Policy, the User may contact Mr. Nayan Chawhan at (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 redress the 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.
- 17. 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.