

Dvara Money Private Limited Privacy Policy

Effective from <1-Nov-2022>

Welcome to the Dvara Money mobile Mobile App and www.dvaramoney.com, operated and owned by Dvara Money ("**Dvara Money**"), which presently has its registered office at Chennai.

Dvara Money manages the website www.dvaramoney.com including the mobile Application Spark App (the "Mobile App") and the website (the "Website"). This Privacy Policy is a part of the Terms and Conditions ([•](#)) to services provided by Dvara Money in relation to the credit product facilitated through its Lender Partners.

All terms defined in the Terms and Conditions have the same meaning used here in this Privacy Policy. This Privacy Policy statement shall apply to all Users who visit and access Dvara Money's Website. The Users unconditionally agree that browsing the Website and/or using its services signifies their unconditional assent to this Privacy Policy. We respect the privacy of its Users and is committed to protect it in all respects. Any dispute with Dvara Money over privacy matters are subject to this Privacy Policy read in conjunction with the Terms and Conditions.

1. This Privacy Policy is published in compliance of:

- i. Section 43A of the Information Technology Act, 2000; and
- ii. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the "SPI Rules") "Personal Information" and "Sensitive personal data or information" shall be as defined under the SPI Rules. The information about the Users as collected by Dvara is:
 - a. information supplied by Users and
 - b. information automatically tracked while navigation (Information).
- iii. Applicable laws/ guidelines issued by Reserve Bank of India

2. In order to avail the Services offered by Dvara Money, Users are required to provide such information and data ("**Personal Information**"), classified as 'Sensitive Personal Information' under Regulation 3 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("**SPI Rules**") and such other information as mentioned below. Personal Information provided in acceptance of this Policy shall amount to written consent under Regulation 5 of the SPDI Rules.

- a. Photograph

- b. Proof of identity
 - c. Marital Status
 - d. Address
 - e. PAN Card Details
 - f. Aadhar Card Details
 - g. Bank Account information
3. Any information collected by Dvara Money from the Users shall only be stored by Dvara in servers located in India, in compliance with applicable Laws.
 4. In the event that any third parties are permitted to collect User's Personal Information for the Credit Product, Dvara Money shall from time-to-time disclose the details of such third parties with the User. Currently Dvara Money shall be sharing the User's Personal Information to Northern Arc Capital Limited ("Lender Partner") for the Credit Products extended through them.
 5. User shall have the right to revoke consent given for the collection, use, storage, and/ or disclosure to any third-party of any or all information collected at any time by writing to/ contacting our Grievance Officer .
 6. To improve the responsiveness and user interface for our Users, Dvara Money may use "cookies", or similar electronic tools to collect information to assign each User a unique, random number as a User Identification (User ID) to understand the User's individual interests using the identified computer. Unless you voluntarily identify yourself, Dvara cannot know 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. Our advertisers may also assign their own cookies to your browser (if you click on their ads), a process that we do not control. We receive certain types of information whenever you interact with us via Website or service through your computer/laptop/netbook or mobile/tablet/pad/handheld device etc.
 7. Dvara Money automatically collects limited information about your computer's connection to the Internet, mobile number, including your IP address, when you visit our Website or service. Your IP address is a number that lets computers attached to the Internet know where to send you data -- such as the pages you view. We automatically receive and log information from your browser, including your IP address, your computer's name, your operating system, browser type and version, CPU speed and connection speed. We may also collect log information from your device, including your location, IP address, your device's name, device's serial number or unique identification number (e.g. UDiD on your iOS device), your device operating

system, browser type and version, CPU speed, and connection speed etc.

8. 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.
9. The Website may include links to other websites or mobile applications. Such websites or mobile applications are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the website/ mobile application, you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from their homepage, you should contact the Mobile Application or website owners directly for more information. When we present information to our advertisers -- to help them understand our audience and confirm the value of advertising on our Websites -- it is usually in the form of aggregated statistics on traffic to various pages / content within our . We use third-party advertising companies to serve ads when you visit our Websites. These companies may use information (not including your name, address, email address or telephone number or other personally identifiable information) about your visits to this and other websites or mobile application, in order to provide advertisements about goods and services of interest to you. We do not provide any Personally Information to third party websites/ advertisers/ ad- servers without your consent, except in the circumstance mentioned in below clause.
10. We take utmost care our user's Personal Information and/or Sensitive Personal information and we share user's personal information with our employees and third-party facilities providers on strictly on a "need to know" basis hence we take all such steps to ensure that electronic records are valid under the Information Technology Act, 2000 as amended from time to time and notifications and rules framed thereunder.
11. Dvara Money may share the sensitive Personal Information to any third party/Service Provider/Alliance Partner without obtaining the prior consent of the User in the following limited circumstances:
 - a. 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.

- b. Dvara Money proposes to share such information within its group companies and officers and employees of such group companies and/or third party service provider for the purpose of processing Personal Information on its behalf.
 - c. Dvara Money may use third-party advertising companies and/or within group companies to serve ads when the User's visits the Website. These companies may use Personal Information about the User's visit to the Website and other websites in order to provide advertisements about goods and services of interest to the User.
 - d. Dvara shall transfer information about the User in case Dvara is acquired by or merged with another Dvara.
 - e. Dvara may share the personal information with the Service Provider, in case the User shows interest in Applying for User.
12. As Per PMLA (Prevention of Money Laundering Act 2002) guidelines and Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 records need to be maintained for a period of up to 10 years from the closer / deletion of account. In the event of any legal / regulatory proceeding is pending we can retain records for a longer period as may be asked by regulatory / statutory authorities.
13. We take appropriate security measures in compliance with Applicable Law to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. In the event, any of your data breach occurs on account of our negligence, actions or omissions, we shall intimate you within a reasonable time.

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.

14. Modifications

We may revise these terms at any time by amending this page. Please check this page from time to time to take notice of any changes we made. In the event you continue to use our services and/ or browse our Website, you consent to be bound by the modifications as well.

15. Grievance Redressal

In the event of any complaints, abuse or concerns with regards to content and or comment or breach of these terms, you may reach out to Dvara Money's representative below at any time between 10.00 am and 6.00 pm Monday to Friday except public holidays.

a. Grievance Redressal Officer

Users are requested to address all their grievances at the first instance to the Grievance Redressal Officer. The contact details of the Grievance Redressal Officer are as provided below:

Name: Chandan A

Address: 10th Floor-Phase, IIT-Madras Research Park Kanagam Village, Taramani, Chennai 600113

Contact number: 080 370 77275

Email ID: spark.care@dvara.com

b. Nodal Officer

If the User does not receive a response from the Grievance Redressal Officer within 15 days of making a representation, or if the User is not satisfied with the response received from the Grievance Redressal Officer, the User may reach the Nodal Officer on the toll-free number below anytime between 10:00am and 6:00 pm on weekdays except public holidays or write to the Nodal Officer at the e-mail address below. The contact details of our Nodal Officer are provided below:

Name: Sajeev VP

Address: 10th Floor-Phase, IIT-Madras Research Park Kanagam Village, Taramani, Chennai 600113

Contact number: 080 470 91556

Email ID: Dm.backendops@dvara.com