

## DVARA MONEY PRIVATE LIMITED PRIVACY POLICY

Welcome to Spark Money App: the Platform of Dvara Money Private Limited (“**Dvara Money/ We**”), a company incorporated in India under the Companies Act, 2013 with its registered office situated at 10<sup>th</sup> Floor, IIT Madras Research Park, Kanagam Village, Taramani, Chennai.

Dvara Money owns, develops, manages and operates its Website and associated Mobile Applications which offers its Users (“**You**” or “**Yours**” or “**End User**”) access and use of the Platform which includes the opportunity to avail the Services offered on/ through the Platform.

This DM Privacy Policy is a part of the DM T&C [dvaramoney-terms-conditions.pdf \(dvaramoney.com\)](https://www.dvaramoney.com/dvara-money-terms-conditions.pdf) applicable to Services provided by/ facilitated by Dvara Money, either directly or indirectly through DM’s authorised Service Provides, Facilitators and or third-party service providers to You.

All terms defined in the DM T&C have the same meaning used here in this DM Privacy Policy. This DM Privacy Policy statement shall apply to all Users who visit, access and or use Dvara Money’s Platform and/ or avail Services either directly or via the DM Platform. The Users unconditionally agree that browsing the Platform and/or availing the Services signifies their complete assent and acceptance to this DM Privacy Policy. We respect the privacy of Our Users and is committed to protecting it in all respects. Any dispute with Dvara Money over privacy matters are subject to this DM Privacy Policy read in conjunction with the DM T&C and the Consent Form.

1. This Privacy Policy is published in compliance/reference 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 Money is:

- a. information supplied by Users and
- b. information automatically tracked while navigation and or use of the DM Platform (Information).

### 2. Spark Account:

- a. In order to use the Platform and avail the Services, Users will have to register on the Platform and create an individual account with a unique user identity using their mobile number and one time password (“OTP”) that is generated upon onboarding and, subsequently thereafter each time he/ she logs in (“Spark Account”). Pursuant to this, for availing the Services, You explicitly agree to provide for the access, sharing, transmission and or storage of Your information (as mentioned below) with Us, the Facilitators and or the Service Partners and or any third-party service providers, to the extent required for the provision and or facilitation of Services as availed by You either directly from Us or from the Service Partners, Facilitators and or any third-party service providers through Us.
- b. You further agree that You are providing specific consent by reading, understanding and accepting the DM T&C, DM Privacy Policy herein and the Consent Form.

Service	Type of Data	Purpose for collection	Period of retention by DM	Disclosure to Service Partners and/ or Facilitators		
				Entity	Type of information/ data	Purpose
Savings Account	a. Full name b. Mobile number c. Father’s name d. Mother’s name e. Date of Birth f. Email address g. Gender h. Permanent and Communication address i. Marital status j. Full name as on Your PAN Card k. Image of PAN card l. Self-photograph m. Employment status n. Occupation	This is required for the creation of the Savings Account (including the KYC process) in partnership with Partner Bank.	All information / details except Aadhar and PAN are retained until the Savings Account is maintained with the Partner Bank through the Platform.  Further, basic details	Partner Bank	All information collected by DM	Required for the creation of Savings Account
				Falcon	Few information mentioned in column 2 including full name, photo and	In case the Savings Account is created in partnership with Shivalik,

	<p>o. Employment Type / Status</p> <p>p. Income</p> <p>q. Photograph as contained in Your</p> <p>r. Aadhar card</p> <p>The following particulars relating to Your nominee for the Savings Account opened by You <i>vide</i> the Platform:</p> <p>a. Full name</p> <p>b. Relationship to You</p> <p>c. Date of Birth</p> <p>d. Email address</p> <p>e. Address</p> <p>f. City</p> <p>g. State</p> <p>h. Pin Code</p> <p>i. Guardian</p>		<p>(which may include person identifiable sensitive information ) of the Users are retained for a further period of two (2) years post deletion of the Savings Account as per internal policy of DM.</p> <p>Aadhar and PAN shall be deleted immediately upon successful KYC verification of the User/ sharing the same with Partner Bank, whichever is later.</p>		Aadhar card.	<p>information/ documents of the User are transmitted to the Partner Bank through Falcon.</p>
Prepaid Instrument	<p>a. Full name</p> <p>b. Mobile number</p> <p>c. Father's name</p> <p>d. Mother's name</p>	This is required for facilitating	In the event the User avails an PPI in	<b>Entity</b>	<b>Type of information/ data</b>	<b>Purpose</b>

nt (“PPI”)	<ul style="list-style-type: none"> <li>e. Date of Birth</li> <li>f. Email address</li> <li>g. Gender</li> <li>h. Permanent and Communication address</li> <li>i. Marital status</li> <li>j. Employment status</li> <li>k. Occupation</li> <li>l. Employment Type / Status</li> <li>m. Income</li> <li>n. Aadhar Card</li> </ul>	issuance of PPI card.	<p>conjunction with the Savings Account, retention of Data shall be as per the Savings Account policy as mentioned above.</p> <p>In the event the Users avail the PPI as a standalone, the collected information shall be stored until the User holds the PPI. Pursuant to the deactivation of the PPI, DM shall retain basic information of the User for a period of two (2) years, post Service availment as per DM internal policy.</p> <p>It is pertinent to note that Aadhar shall be deleted immediately upon sharing the same with Fino.</p>	Fino	All information collected by Dvara Money.	For the issuance of PPI.
				M2P	All information collected by Dvara Money.	For facilitating the issuance of PPI.
ITR Services	<ul style="list-style-type: none"> <li>a. Name</li> <li>b. Contact number</li> <li>c. City</li> <li>d. State</li> <li>e. Company details</li> </ul>	This is required for the filing of ITR returns of the User.	Shall be retained until ITR Service is provided to the User (which shall	N.A.		

	<ul style="list-style-type: none"> <li>f. Pan number</li> <li>g. Pan photocopy</li> <li>h. Bank details- A/C number and IFSC code</li> <li>i. Communication Address</li> <li>j. IT login password</li> <li>k. Form 16 for salaried Users</li> </ul>		<p>include each consequent ITR Service being availed).</p> <p>Further, basic details of the User (which may include person identifiable sensitive information ) shall be retained for a further period of two (2) years, post Service availment as per the internal policy of DM.</p>			
Gold	This shall be an add-on service offered to the User upon availment of Savings Account. Hence, the existing information with DM (as mentioned in Savings Account above) shall be used for the same.	This is required for the facilitation of digital gold accumulation in partnership with a Digital Gold Partner.	Information used for facilitation of digital gold shall be retained until the User maintains the Savings Account or maintains digital gold balance, or as per statutory requirements whichever is later.	<b>Entity</b>	<b>Type of information/ data</b>	<b>Purpose</b>
				Dvara SmartGold	Full name as per Pan Card, Contact Number and reference ID.	For facilitating the User to accumulate digital gold through Dvara SmartGold
Insurance	<ul style="list-style-type: none"> <li>a. Name</li> <li>b. Address</li> <li>c. Aadhar Number</li> <li>d. Communication Address</li> <li>e. Email</li> <li>f. Name</li> <li>g. Date of birth</li> <li>h. Gender</li> <li>i. Language</li> <li>j. Mobile Number</li> <li>k. Nominee Name</li> </ul>	This is required for the facilitation of Insurance from the Insurance Partner.	Shall be retained until the User holds the insurance of the Insurance Partner or as per statutory / audit	All information/ documents are shared with Magma for the facilitation of insurance to the User.		

	l. Nominee DOB m. Nominee Relation n. PAN number		requirements.	
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It is clarified that other than the Facilitators mentioned in the above table, few information/ data of the User shall be shared/ accessed by other Facilitators / Service Providers / Partners or any third-party service providers as the case may so require, as well for the provision of/ facilitation of Services to the Users. Retention of User information and or any data maybe extended in addition to the specifications stated above, in line with meeting necessary statutory, legal and or audit requirements depending on the Services being availed by the User.

b. In addition to the above, the User acknowledges that the below data/ information shall be captured and stored by DM or permissions (as mentioned below) shall be sought upon access/ usage of DM Platform in availing the Services:

Activity/Purpose	Type of Data provided by You	Additional Details	Retention Period
Data/Information	The following details in relation to Your device shall be collected at the time of Your use and Access of the DM Platform and/or Services: <ul style="list-style-type: none"> <li>a. IP address</li> <li>b. Mobile name and model</li> <li>c. Android version</li> <li>d. Android id</li> <li>e. Manufacturer</li> <li>f. Location</li> </ul>	Automatic collection of Data upon Your access/use of the DM Platform.	Shall be retained until the Services are availed through the DM Platform.
Permissions	Camera	To take picture of documents, proof and KYC documents	
	File Storage	To upload picture of documents, proof and KYC documents from User's phone	
	Location Permission	To enhance User support by displaying nearby Spark Dost centres, Dvara Money will only retrieve location details when the Platform is actively in use. In this connection, Dvara Money ensures that location information is not fetched in the background.	

c. Notwithstanding anything contained herein, Dvara Money's retention of User information and or any data maybe extended in addition to the specifications stated above, in line with meeting necessary statutory, legal and or audit requirements depending on the Services being availed by the User.

d. It is pertinent to note that few of the above requested information are personally identifiable and can be 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 ("SPDI Rules"). However, these 'Sensitive Personal Data' are not stored by Dvara Money (except PAN for the provision of ITR Services) and are shared with Our Service Partners including RBI regulated Partner Bank for the creation of Savings Account and/ provision of other Services.

### 3. Withdrawal of consent and Deletion Request:

3. Withdrawal of consent:

- a. If the User wants to withdraw the consent given earlier for use, storage and sharing of the Limited Information (provided for all Services except PPI) and desires for the same to be deleted, the User shall send in a request for such withdrawal by clicking on the 'delete my data' option available in the 'account details' section of the Platform and feed in the OTP generated to his/ her registered mobile number. In case of Limited Information pertaining to PPI, You have to place a request for deletion with the Spark Dost agent. ("Deletion Request") Upon 30 (thirty) days from the Deletion Request, Dvara Money shall delete the Limited Information pertaining to the User. Provided however, if required by regulatory, audit, legal and or statutory requirements, We will have the right to keep a copy of Your data/information provided by You for such statutory, audit, legal and or regulatory purposes, as the case may so require.
  - b. In the event of such a Deletion Request, Dvara Money shall have the option to not provide the Services and/ or temporarily suspend its Services provided/ facilitated to You, at any given point in time.
  - c. For the avoidance of doubt, it is clarified that in case of withdrawal of consent and Deletion Request with respect to the data/ information collected for Services facilitated by Dvara Money, such withdrawal and Deletion Request shall not have an automatic effect of withdrawal/ deletion of data/ information stored at the Facilitators and Service Partner's end. In connection with this, the User will have to take the steps as mentioned in such Facilitators and Service Partner's terms and conditions.
4. All required information is service dependent and Dvara Money may use the above said User information to, maintain, protect, and improve the Services (including advertising and or marketing services) and for developing new services. Such information will not be considered as sensitive if it is freely available and accessible in the public domain or is furnished under the Right to Information Act, 2005, any rules made there under or any other law for the time being in force. The primary reason for gathering information is to improve Our products, deals, services, website content and navigation.
5. 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 Money 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 and store certain types of information whenever You interact with Us via Website, Mobile Application or service through your computer/laptop/netbook or mobile/tablet/pad/handheld device etc.
6. We may receive information about You from other sources, add it to database in relation to You and treat it in accordance with this DM 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.
7. The Platform 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 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 the mobile application's 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 the Platform, it is usually in the form of aggregated statistics on traffic to various pages / content within the Platform. We use third party advertising/marketing companies to serve ads when You visit the Platform. 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.
8. We take utmost care of our user's Personal Information and/or Sensitive Personal information and We share User's personal information with the Service Partners, Facilitators, 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.

9. Dvara Money may share the sensitive Personal Information to any third parties without obtaining the prior consent of the User in the following limited circumstances:
  - 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.
  - ii. Dvara Money proposes to share such information within its group companies, auditors, consultants officers and employees of such group companies and/or Service Partners, Facilitators and/ or third-party service provider for the purpose of processing Personal Information on its behalf.
  - iii. Dvara Money may use third-party advertising companies and/or within group companies to serve ads when the User's visits the Platform . These companies may use Personal Information about the User's visit to the Platform and other websites in order to provide advertisements about goods and services of interest to the User.
  - iv. Dvara Money shall transfer information about the User in case Dvara Money is acquired by or merged with another Dvara Money.
  - v. Dvara Money may share the Personal Information with the Service Partners, Facilitators and such other third-parties on a need-to-know basis in case the User shows interest in availing the Services.
  
10. We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. ALL INFORMATION GATHERED ON DVARA MONEY IS SECURELY STORED WITHIN DVARA MONEY CONTROLLED DATABASE. 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, ANY INFORMATION YOU INCLUDE IN A POSTING TO THE DISCUSSION AREAS IS AVAILABLE TO ANYONE WITH INTERNET ACCESS.

## **11. 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.

### **i. 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](mailto:spark.care@dvara.com)

### **ii. 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: Sachin Immanuel

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

Contact number: 080 470 91556

Email ID: [dm.backendops@dvara.com](mailto:dm.backendops@dvara.com)