

Privacy Policy

Winvesta India Technologies Pvt. Ltd., CIN U72900MH2019FTC328790 (“Company”, “we”, “us”, or “our”), a company incorporated in India with its registered office at Famous Working Company, 1st Floor, Famous Studios, 20, Dr E Moses Rd, Mahalaxmi, Mumbai - 400 011 including its subsidiaries and affiliates and the rights and choices available to individuals, regarding personal data. Personal data means any information that relates to an identifiable individual.

We may alter this Privacy Policy (“Policy”) as needed for certain products and services and to abide by the local laws or regulations around the world, such as by providing supplemental information in certain countries. This policy does not apply to the Company's processing of the personal data of its personnel such as employees and contractors.

When we collect certain information about you, we comply with pertinent local regulations, which may include data protection acts such as those in India and the European Union (including the United Kingdom).

Key terms

It would be helpful to start by explaining some key terms used in this Policy:

Winvesta India Technologies Pvt. Ltd.	Famous Working Company, 1st Floor, Famous Studios, 20, Dr E Moses Rd, Mahalaxmi, Mumbai - 400 011
Special category Personal Information	<ul style="list-style-type: none">• Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership.• Genetic and biometric data.• Data concerning health, sex life or sexual orientation.

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1. The personal data we collect

We collect personal data about individuals from various sources described below. where applicable, we indicate whether and why individuals must provide us with personal data, as well as the consequences of failing to do so.

While registering on our website for availing any of our services, we collect information directly from individuals and the parties who are registering with us.

We collect personal data directly from individuals and the parties with which we do business, including prospects. These may include parties that interact with us directly (such as individuals who download our mobile applications), parties to which we provide goods or services (such as clients, banks or financial institutions, merchants, and individuals) (collectively, “clients”), parties that provide services to us (such as vendors) (collectively, “service providers”), and other parties with whom we offer or provide products and services (such as independent sales organizations) (collectively, “partners”).

We may also ask you for certain financial information, including details of your Linked bank account, Indian financial system code (IFSC) of the bank, and/or other payment related details or other payment method data, and debit instructions to process the services. We may ask you to provide certain additional information about yourself on a case-to-case basis, either ourselves or via a third party engaged for such purpose by the Company. All information disclosed by you shall be deemed to be disclosed willingly and without any coercion. No liability pertaining to the authenticity / genuineness / misrepresentation / fraud / negligence of the information disclosed shall lie on the Company nor will the Company be in any way responsible to verify any information obtained from you.

You understand and consent to the recording of all phone conversations and WhatsApp messages by accessing or using our services. These recordings are used for training, regulatory compliance, quality control, dispute resolution, and any other legitimate reason. As long as we maintain and keep these recordings in compliance with relevant laws and regulations, you agree to such recording. Note that our

WhatsApp channel is primarily used for updates and information sharing. Any user-initiated chat on WhatsApp will be sent to our Customer Support team and will be handled as a conversation. Within 24 hours, responses will be tracked in those initiated chats, and our privacy policy will apply to any information shared.

The above information is collectively referred to as (“Personal Information”).

We may collect information from these parties in a variety of contexts, such as when completing one of our online forms, making an application for one of our products or services, interacting with us in person or on social media, or corresponding with us. The types of information we obtain in these contexts include:

- Contact information of the business entity and its personnel who interact with us, such as name, job title, address, telephone number, and email address.
- Profile information, such as username and password that an individual may establish on one of our websites or mobile applications, along with any other information that an individual enters into their account profile.
- Demographic details, such as date of birth, country of citizenship and/or country of residence.
- Information about individuals’ affiliation with a legal entity, such as an individual’s role, and whether he or she is a beneficial owner or authorized signatory.
- Photographs, video footage, audio recordings, or written statements provided or captured during a Winvesta event or when giving a testimonial.
- Details of the individual's consent to and release of media and image rights to Winvesta.
- Government-issued identification numbers (to the extent permitted under applicable law), such as a national identification number (e.g., a Social Security Number, tax identification number, or passport number), state or local identification number (e.g., a Driver’s License or other government-issued identification number), and a copy of your government-issued identification card.
- Feedback and correspondence, such as information you provide when you request information from us, receive customer support, or otherwise

correspond with us, including by interacting with our pages on social networking online sites or services.

- Financial account information, such as payment card or bank account details.
- Information about merchants, such as merchant name, merchant ID and category code, merchant location where a transaction occurred, and information about transactions processed by the merchant, including transaction volume, velocity, amounts, types of goods or services sold, and chargeback ratios.
- Information related to the use of Winvesta products or services, such as account information, spending thresholds, spending activity and patterns, and information about the transactions we process.
- Precise geolocation information, if you authorize our mobile application to access your location.
- Marketing information, such as your preferences for receiving marketing communications and details about how you engage with our marketing communications.
- Other information supplied by job applicants, such as professional credentials and skills, educational and work history, and other information of the type included on a resume or curriculum vitae.

Information that we collect about individuals who do not interact with us directly

We may receive personal data about individuals who do not interact with us directly. For example, our clients, service providers, and partners may provide us with information about individuals other than themselves when using our products or services. If you are providing us with personal data of another individual, please ensure you have brought this Privacy Notice to their attention.

Information about customers of our clients that our clients send to us or allow us to collect in the context of the services that Winvesta performs, such as information related to financial transactions initiated by the customer, account registrations, and in

some cases information needed to verify a customer’s identity and details of products or services purchased, and as otherwise stated in an applicable specific privacy policy for a Winvesta product or service. Where our technology is incorporated into a merchant’s mobile application or website, we also may automatically collect certain information of the type described in the section below titled “Information collected via automated means.”

We and our service providers may collect information about individuals that is publicly available, including by searching publicly accessible government lists of restricted or sanctioned persons (such as the Specially Designated Nationals And Blocked Persons List), public records databases (such as company registries and regulatory filings), and by searching media and the internet. we and or our third party verification providers may also collect information from private or commercially available sources, such as by requesting reports or information from credit reference and fraud prevention agencies, to the extent permitted under applicable law.

We may also maintain pages for our company and our products and services on a variety of third-party platforms, such as LinkedIn, Facebook, Twitter, YouTube, Instagram, and other social networking services. When you interact with our pages on those third-party platforms, the third-party’s privacy policy will govern your interactions on the relevant platform. If the third-party platform provides us with information about our pages on those platforms or your interactions with them (e.g. for lead generation purposes), we will treat that information in accordance with this Privacy Policy.

2. Information collected via automated means

When you access our websites or use our mobile applications, we, our service providers, and our partners may automatically collect information about you, your computer or mobile device, and activity on our websites or mobile applications.

Typically, this information includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier, browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on or in our websites or mobile applications, such as pages or screens you accessed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Certain products or services that we provide or which merchants may incorporate into their websites or mobile applications may automatically collect additional information, as may be further described in a separate privacy notice.

Sensitive personal data

In the context of processing employment applications, we may also request sensitive information, such as racial or ethnic origin or information about disability, where required or permitted by law of the country in which you are applying for employment.

Outside of these contexts or otherwise as we specifically request, we ask that you not provide us with any sensitive personal data (meaning information revealing racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, genetic, health, or biometric information, information about sex life or sexual orientation, or criminal convictions or offenses) through our websites or mobile applications, or otherwise to us.

3. How do we use your Personal Information?

Under data protection law, we use your Personal Information, and we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your Personal Information for and our reasons for doing so:

The above table does not apply to the special category Personal Information, which we will only process with your explicit consent.

Promotional communications

We may use your Personal Information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services or any new communication from our end.

This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your Personal Information with the utmost respect and never sell it with other organisations outside the Company for any purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at support@winvesta.in
- using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Where your Personal Information is held?

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents.

How long your Personal Information will be kept?

We will keep your Personal Information while you have an account with us or we are providing [products AND/OR services] to you. Thereafter, we will keep your Personal Information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by laws of the land.

We will not retain your Personal Information for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of Personal Information.

4. Your rights and choice

You have the following rights, which you can exercise free of charge:

Rectification: The right to require us to correct any mistakes in your Personal Information.

Restriction of processing: The right to require us to restrict processing of your Personal Information – in certain circumstances, e.g. if you contest the accuracy of the data.

Data portability: The right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain situations.

Access: The right to be provided with a copy of your Personal Information (the right of access).

For further information on each of those rights, including the circumstances in which they apply, please contact us.

If you would like to exercise any of those rights, please:

- email us see below: 'How to contact us'; and
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

- let us know what right you want to exercise and the information to which your request relates.

5. How we keep your data safe

Safeguarding your data is paramount to us. We implement stringent security measures to thwart any inadvertent loss, unlawful access, or misuse of your data.

Access to your personal information is restricted solely to authorized individuals with genuine business purposes, who are obligated to adhere to strict confidentiality protocols. In the event of any suspected breach in data security, we have well-defined procedures in place to promptly address and notify you, along with relevant regulatory authorities, as mandated by applicable laws.

For comprehensive insights and guidance on fortifying your information and devices against a spectrum of online threats, we recommend visiting www.getsafeonline.org.

6. This Website may link to other websites

This website may contain links to other websites for additional information or resources. Please note that we have no control over the content or privacy practices of these external sites. Therefore, we cannot be held responsible for the protection and privacy of any information you provide while visiting such sites, as they are not governed by this privacy statement. We encourage you to exercise caution and review the privacy policies of any third-party websites you visit.

7. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The data protection regulations provide you with the right to file a complaint with the appropriate supervisory authority. This applies to the jurisdiction where you operate, reside, or where any suspected breach of data protection laws has transpired, following the guidelines outlined in the relevant data protection legislation.

8. How to contact us

Please contact us by email or telephone if you have any questions about this Policy or the information we hold about you.

Our contact details are support@winvesta.in

This Privacy Policy is updated in June 2024. We may change this privacy notice from time to time – when we do we will inform you via our website.