

## PRIVACY POLICY

1st JUNE, 2024

### 1. INTRODUCTION

This Privacy Policy is a part of and incorporated within, and is to be read along with the Terms of use of our platform (the “Terms of Use”).

In this policy, **we, us, our** and **Infliv Exchange** refer to Infliv Exchange. For more information about us and how to contact us, see Section 11.

We respect your privacy and are committed to protecting it through our compliance with this Policy.

This privacy policy (**Policy**) applies when we are acting as a data controller with respect to the personal data of our users. This Policy describes how we collect, use and share personal data of consumer users across our websites, including www.infliv.in (the **Website**), Infliv Exchanges mobile and desktop application (the **App**) and services offered to users (collectively with the Website and the App, the **Services**), and from our partners and other third parties. When using any of our Services you consent to the collection, transfer, storage, disclosure, and use of your personal data as described in this Policy. This Policy does not apply to anonymised data, as it cannot be used to identify you.

Please read this Policy carefully to understand our policies and practices regarding your personal data and how we will treat it. By accessing or using the Services, you agree to this Policy. Our Services also incorporate privacy controls which affect how we will process your personal data. Please refer to Section 5 for a list of rights with regard to your personal data and how to exercise them.

This Policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### 2. PERSONAL DATA WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

There are three general categories of personal data we collect.

#### 2.1 INFORMATION YOU GIVE TO US.

(a) We collect your account data, which may include personal identification information such as your name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email address, and formal identification information such as Tax ID number, passport number, drivers license details, national identity card details, photograph identification cards, and/or visa information (collectively, **Account Data**). The Account Data may be processed for the purposes of providing to you our Services, satisfying anti-money laundering and know-your-customer obligations, and ensuring the security of the Services, maintaining back-ups of our databases and communicating with you. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested Services.

(b) We process financial information such as bank account, credit card or PayPal information when you order Services in order to facilitate the processing of payments (**Payment Information**). The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

(c) We may process information contained in or relating to any communication that you send to us (**Correspondence Data**). The Correspondence Data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this

processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

(d) We may process information included in your personal profile, which may include your location, time zone and website (**Profile Data**). The Profile Data may be processed for the purposes of providing you a better user experience when using the Services. The legal basis for this processing is your consent.

**2.2 INFORMATION WE AUTOMATICALLY COLLECT FROM YOUR USE OF THE SERVICES.** When you use the Services, we may automatically process information about your computer and internet connection (including your IP address, operating system and browser type), your mobile carrier, device information (including device and application IDs), search terms, cookie information, as well as information about the timing, frequency and pattern of your service use, and information about the transactions you make on our Services, such as the name of the recipient, your name, the amount and type of cryptocurrency and timestamp (**Service Data**). The Service Data is processed for the purpose of providing our Services. The legal basis for this processing is the adequate performance of the contract between you and us, to enable us to comply with legal obligations and our legitimate interest in being able to provide and improve the functionalities of the Services.

**2.3 INFORMATION WE COLLECT FROM THIRD PARTIES.** From time to time, we may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. The legal basis for the processing of such data is compliance with legal obligations.

### **3. DISCLOSURE OF PERSONAL DATA**

3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

3.2 We may disclose Service Data to a variety of third party service providers insofar as reasonably necessary to improve the functionalities of the Services. For example, we may disclose Service Data to obtain useful analytics, provide in-app support to mobile app users, determine location data and provide search engine functionality to our users.

3.3 We may share aggregated data (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; or in order to protect your vital interests or the vital interests of another natural person; to protect the safety or integrity of the Services, or to explain why we have removed content or accounts from the Services; or to address fraud, security, or technical issues; or to protect our rights or property or the rights or property of those who use the Services.

### **4. RETAINING AND DELETING PERSONAL DATA**

4.1 This Section 4 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3 We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide the Services to you, you can request that we erase your personal information and close your account.

4.4 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **5. CHILDREN**

Our Services are not intended for children. You must also be old enough to consent to the processing of your personal data in your country without parental consent. No one under age 18 may provide any personal data through the Services. If you are under 18,

do not use or provide any information through the Services or on or through any of their features or register an account, make any purchases through the Services, use any of the interactive features of the Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

## **6.COOKIES**

### **6.1About cookies**

(a)A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

(b)Cookies may be either persistent cookies or session cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

(c)Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

(d)We can also use other technologies with similar functionality to cookies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser, and device.

### **6.2We can use these technologies for the following purposes:**

(a)to identify you and log you into the Services;

(b)to store information about your preferences and to personalize the Services for you;

(c)as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;

(d)to help us display content that will be relevant to you;

(e)to help us analyse the use and performance of the Services ; and

(f)to store your preferences in relation to the use of cookies more generally.

### **6.3 Use of Cookies**

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser that enables the site or service provider's systems to recognize your browser and capture and remember certain information. We may use cookies to help us to understand, remember and save your preferences for future visits.

Cookie and tracking information collected by us may be shared with third-parties which directly support our advertising/promotional activities and are involved in development/updation of our Online Platforms.

Commonly used browsers are set up to automatically accept cookies however you can modify your device's settings to either alert you when you receive cookies or block cookies. If you disable/block cookies, it may affect the performance and functionality of our Online Platforms and may also restrict your experience. If you use different devices to access our Online Platforms, you would be required to modify each device's settings individually to suit your cookie preferences.

## **7.DATA SECURITY**

7.1 We have implemented measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## 7.2 Steps taken to ensure data security:

- (a) All the user information can only be accessed by authorized users;
- (b) Users need to authenticate themselves with a username-password combination.

7.3 Unfortunately, the transmission of information via public networks such as the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted through the Services. Any transmission of personal data is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Services.

## 8. CHANGES TO OUR PRIVACY POLICY

(a) It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal data, we will notify you by e-mail to the primary e-mail address specified in your account. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this Policy to check for any changes.

## 9. GOVERNING LAW

This Privacy Policy shall be governed by Indian laws, in particular, the Information Technology Act, 2000 and rules framed there under and any amendment, modification, statutory enactment thereto from time to time. Any dispute that may arise from this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of Durg, Chhattisgarh.

## 10. CONTACT INFORMATION

The information described in this Privacy Policy is collected and retained by the Infliv Exchange, which owns the Website and the App. If you have any concerns pertaining to this Privacy Policy and/or the information shared hereunder, please contact us at:

Compliance Officer [INFLIV TECHNOLOGY PRIVATE LIMITED]

BHILAI, INDIA.

Email: care@infliv.in

Our Compliance Officer shall endeavor to respond to you within 30 days of your submission. Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such an event.

We may charge you a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.