

PRIVACY POLICY

SPINNY CAPITAL RESPECTS YOUR PRIVACY!

Spinny Capital Private Limited

(Approved by the Board dated September 14, 2024)

1. INTRODUCTION

This Privacy Policy sets out how the information provided by you is collected, used, stored, processed, transferred and protected. Please read the terms carefully. By accessing the Website or using any of our services, you agree to be bound by all the terms of this Privacy Policy.

For the purposes of this Privacy Policy, ‘we’, ‘us’, ‘our’, ‘**Spinny Capital**’ and “**Company**” refers to M/S Spinny Capital Private Limited (including its representatives and Affiliates) and ‘**you**’ refers to the visitors, customers or borrowers or users of our website or application.

"**Affiliate**" means any Person directly, or indirectly through one or more intermediaries, that Controls, is Controlled by or is under common Control with Spinny Capital.

"**Control**," as used in the immediately preceding sentence, shall mean with respect to any person, the possession, directly or indirectly, of the power, through the exercise of voting rights, contractual rights or otherwise, to direct or cause the direction of the management or policies of the controlled person.

"**Person**" includes any natural person, corporation, partnership, Limited Liability Company, trust, unincorporated association or any other entity.

By using our website WWW.SPINNYCAPITAL.COM (“**Website**”)/mobile application SPINNY (“**App**”) and/or registering yourself at the Website/App or any other web domain owned by the Company, you authorize us to contact you via email or phone call or SMS or WhatsApp or any other electronic medium and offer you the services for the product(s) you have opted for based on your needs, impart product knowledge, offer financing solutions, offer other promotional offers running on Website/App. Irrespective of the fact that you have registered yourself under DND or DNC or NCPR service, by registering on the Website/App, you still authorize us to give you a call from Spinny Capital. By registration, you also authorize us to send Messages/SMS/Email alerts to you for your login details and any other service requirements or some advertising messages/emails from us. If you are no longer interested in receiving e-mail announcements and other marketing information from us, or you want us to remove any information that we have collected about you, please e-mail your request to the Nodal Officer.

This policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage.

We understand and believe that the information provided by you is correct. However, please understand that the services provided by us may be discontinued, at our sole discretion, if any information provided by you is found to be untrue, inaccurate, out of date, incomplete or subsequently becomes untrue, inaccurate, out of date or incomplete, or there are reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete.

2. INFORMATION WE COLLECT

We will collect the following information from you:

- a) Personal Information that will mean and include all kind of information which can be linked to a specific individual or to identify any individual, directly or indirectly, such as name, age, address, contact details (phone numbers/ email address), date of birth and financial details.
- b) Clickstream data that includes information about your interaction with various elements of our Website and App.
- c) If appropriate permissions are provided by you, we collect the GPS location on various platforms that you use the service on App/Website. Location might be collected at certain times that might depend on your App/Website usage or the time of the day.
- d) Personal finance related questions/information, which are mandated by the Reserve Bank of India for the purpose of providing financial solutions.
- e) Details required in a KYC document which is the mandatory document as per the guidelines of Reserve Bank of India.
- f) Documentary proof/information of educational qualifications, wherever applicable
- g) Constitution details of a vendor including without limitation, name, office address, and constitutional documents.

3. PURPOSE, USE AND STORAGE OF COLLECTED INFORMATION

The information/data collected (as mentioned above) may be used for analytics to ultimately improve our service offerings to you. It helps us to find geographical areas that might require a higher degree of support, provide appropriate leads or personalize the App/Website experience. The information/data is also collected for the purposes of providing proper services, verification of the identity and usage information.

Information collected will be used for the following purposes:

- a) For issuance of the financial solution that you have opted for.
- b) For providing information about various products and services.

- c) For addressing queries put forth by you and for resolving the concerns pertaining to any service or product.
- d) For processing your transactions and also to provide you with transaction and post transaction-related services.
- e) For providing, improving, and marketing our products and services, including site content and performance.
- f) For sending you survey and marketing communications.
- g) For facilitating various programs and initiatives launched either by us or third party which we believe may be of interest to you.
- h) For facilitating usage of our Website/App.
- i) For improving our services, product or content on our Website/App.
- j) For sending notices, communications, offer alerts and to contact you over the telephone/mobile number and/or e-mail address provided by you for sending information of our products in which you have shown your interest, payment reminders, other service details and other general information about your financial solution.
- k) For verification purposes.
- l) To improve our products and enhance customer service.
- m) For Aadhaar authentication and sharing, storing, using Aadhaar data.
- n) For sales and marketing activities
- o) Allow you to access specific account information.
- p) For any value-added services which the Company may provide from time to time.

4. INFORMATION SHARING AND DISCLOSURE

We will not share the information that we have collected from you to anyone other than as specifically noted herein below:

- a) For facilitating the provision, regular reminders and servicing of financial solutions provided to you.
- b) Where information collected by us is required to be disclosed to comply with any applicable law, regulation and legal process; in response to law enforcement authority or other governmental official request; to detect, prevent, or otherwise address fraud, cyber incidents, prosecution, and punishment of offences; for security or technical issues; to investigate a complaint or security threat and for any public interests.
- c) For marketing purpose but only under circumstances where you have specifically authorized or consented for the same.
- d) Where we are required to disclose the information as a part of any statutory obligation to Reserve Bank of India or any other statutory authority.

- e) We may share and/or transfer your information to any of our Affiliate, holding/ and or subsidiaries/ group companies. Our affiliates, holding/ subsidiaries/ group companies may also from time to time send by e-mail or otherwise, information relating to their products or services.
- f) We may also share and/or transfer your information to any successor-in-interest as a result of a sale of any part of our business or upon the merger, reorganization or consolidation of Spinny Capital with another entity on the basis that Spinny Capital is not the surviving entity.
- g) We may share personal information with our other corporate entities and affiliates to help us operate our business and the site or administer activities such as detection of identity theft, fraud and other potentially illegal acts, to facilitate joint or co-branded services that you request where such services are provided by more than one corporate entity. We may share your information with these third parties for those limited purposes provided that you have given us your permission.
- h) Where you provide Personal Information of beneficiaries/dependents/other individuals to the Company, you agree (i) to inform the individual about the content of this Privacy Policy and (ii) to obtain any legally required consent of Personal Information about the individual in accordance with this Privacy Policy

5. RIGHTS UNDER THE POLICY

The below mentioned rights can be exercised by you as and when we obtain or hold personal information about you, or access personal information we hold about you, and for obtaining its correction, update, amendment or deletion in appropriate circumstances where permitted by applicable law or regulation. Some of these rights may be subject to some exceptions or limitations.

- a) You have the right to Access your personal data held about you and to learn the origin of the data, the purposes and means of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed;
- b) Withdraw your consent at any time where your personal data is processed with your consent;
- c) Update and correct your personal data so that it is accurate;
- d) Restrict the processing of your personal data in certain circumstances, e.g. where you have contested the accuracy of your personal data, for the period enabling us to verify its accuracy;
- e) Obtain your personal data in an electronic format;
- f) File a complaint with us and/or the relevant Nodal Officer; and
- g) Object to us processing your personal data, or tell us to stop processing it (including for purposes of direct marketing, survey etc)

The above rights can be exercised by you by approaching the Nodal Officer.

6. SECURITY MEASURES

Protection of your information is of paramount importance to us. We adopt appropriate data collection, storage and processing practices and security measures to protect against any unauthorized access, alteration, disclosure or destruction of your information, username, password, transaction information and any other information/data stored with us. Some of the security measures taken by us are as following:

- a) The information collected by us is stored on servers that are secured behind a firewall. Further, access to the servers is password-protected and is strictly limited.
- b) All information transmitted to and from our server is fully encrypted.
- c) The data that is passed in APIs is passed over secure TLS based http connection.
- d) We do not store any payment or cards related information on our servers. Your data stored in our systems is not visible to anyone.
- e) We are ISO 27001:2013 certified.
- f) Each financial solution and the transaction that is carried out is tagged to a customer through an email id which is then protected by a password.
- g) Your personal information in Spinny Capital account is not visible to anyone with the exception of Spinny Capital. End-to-End encryption is used to transmit data between all entities, to protect against network vulnerabilities.

7. UPDATE/CORRECTION/DELETION OF INFORMATION

You have the right to access your personal information. You also have the right to request correction of the information shared by you. Changes can be made in the system as and when there is any requirement for a change in the information. Personal information can be corrected or amended by contacting us. We will make efforts in good faith to make the requested changes in our then-active databases as soon as reasonably possible. You may contact us through the Nodal Officer to have your information updated/corrected/deleted with us.

8. RETENTION PERIOD

All information collected by us will be stored with us as long as it is necessary for us to fulfill our obligations in respect of the provision of the services and in accordance with the applicable laws and policies. Information collected by us can be retained by us if we believe it to be necessary to prevent fraud or future abuse; if required by law, for other legitimate purposes.

9. CONSENT

By using our Website/App and by providing your information, it is assumed that you have provided your express consent to the collection and use of the information, which is disclosed in accordance with this Privacy Policy, including but not limited to, your express consent for sharing this information as per this Privacy Policy. We recommend that you do not use/access and/or continue to use/access the Website/App if you do not agree to the terms and conditions of this Privacy Policy. We obtain your consent depending on our relationship with you. Thus, the consent is obtained in the following manner:

Consent of the **customer** is taken on the proposal form/ through acceptance of the terms and conditions of our App or website.

By using our website or by providing your information as mentioned above, it is assumed that you have provided your express consent to the collection and use of the information, which is disclosed in accordance with this Privacy Policy, including but not limited to, your express consent for sharing this information as per this Privacy Policy. We recommend that you do not use/access and/or continue to use/access the website, WAP service or app if you do not agree to the terms and conditions of this Privacy Policy. Customers can choose not to continue buying our product/services and drop the transaction by not making payment.

10. COOKIES

A cookie is a small text file that is stored on a computer for record-keeping purposes. We use cookies and other technologies such as pixel tags and clear gifs to store certain types of information each time you visit any page on our Website/App. Cookies enable to recognize the information you have consented to give to Website/App and help us determine what portions of our Website/App are most appropriate for your professional needs. We may also use cookies to serve advertising banners to you. These banners may be served by us or by a third party on our behalf. These cookies will not contain any personal information.

Whether you want your web browser to accept cookies or not is up to you. If you haven't changed your computer's settings, most likely your browser already accepts cookies. If you choose to decline cookies, you may not be able to fully experience all features of the Website/App. You can also delete your browser cookies or disable them entirely. But this may significantly impact your experience with our Website/App and may make parts of the Website/App non-functional or inaccessible. We recommend that you leave them turned on.

Third Party Cookies Third parties may place cookies on WWW.SPINNYCAPITAL.COM. The information practices of these third parties are not covered by our Privacy Policy. Please contact

them directly for more information about their privacy practices. Also, as described above, you may modify the settings in your browser to notify you when you receive a new cookie and disable cookies altogether.

11. OTHER SITES

There might be affiliates or other sites linked to our Website/App. Thus, when you visit those sites, the affiliated sites may have different privacy practices and we encourage you to read their privacy policies. These sites may place their cookies or other files on your computer, collect data or solicit personal information.

12. ACCEPTANCE OF THESE TERMS

By using our Website/App, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy policy, please do not use our Website/App. Your continued use of our Website/App following the posting of changes to this Privacy Policy will be deemed as your acceptance of those changes.

13. NODAL OFFICER

In case you have any grievances with respect to in accordance with applicable law on Information Technology and rules made there under, the name and contact details of the Nodal Officer are provided below:

Name: - Pushkar Singh

Designation: - Head- Operation & Credit

Address: - 7th Floor, Tower- A, Capital Business Park, Sector- 48, Sohna Road, Gurgaon, Haryana- 122001

Email: - pushkar.singh@spinnycapital.com

For any queries or grievances pertaining to this privacy policy or collection, storage, retention or disclosure of your information under the terms of this Privacy Policy, you can contact the Nodal Officer on the abovementioned address and email ID.

Notwithstanding anything mentioned before, we reserve the right to contact you via any mechanisms, not limited to email, SMS, or phone calls, to solicit feedback of your experience and to provide any additional services that you would be eligible for, either as a customer or as a visitor. We should not be held liable for any damage occurring to you as part of feedback solicitation and additional service provision.

14. CHANGES TO THIS PRIVACY POLICY

M/S Spinny Capital Private Limited reserves the right to amend or modify this Privacy Policy at any time, as and when the need arises. We request you to regularly check this Privacy Policy from time to time to keep you apprised of changes made. Your continued use of the Website gives your unconditional acceptance to such change in terms of Privacy Policy.