



OXYZO FINANCIAL SERVICES PRIVATE LIMITED
(COMPANY OR OXYZO)

PRIVACY POLICY

REVIEW & APPROVING AUTHORITY

Authority	Designation
Prepared By	Compliance
Reviewed by	Operational Committee
Approved By	Board of Directors

VERSION HISTORY

Version	Issue Date	Brief Description
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1. Introduction

This Privacy Policy ("Policy") of Oxyzo Financial Services Private Limited has been created to comply with the legal requirement under the provisions of the Information Technology Act, 2000 and RBI Guidelines including Digital Lending dated Sep 02, 2022 and amendments thereto that require intermediaries to publish the rules and regulations, privacy policy and terms for access or usage of their website/mobile app and is primarily governed by Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 or other agencies and other applicable regulations. This Policy is applicable to Oxyzo Financial Services Private Limited and its subsidiaries/associates naming Oxy Ventures Private Limited, Oxy B Securities Private Limited, Oxyzo Investment Managers Private Limited, Oxyzo Finvest Private Limited, Ziel Financial Technologies Private Limited and ZFIRST Technologies Private Limited

Oxyzo Financial Services Private Limited collects, uses, discloses and transfers personal information of users through its websites, mobile applications, digital

lending applications, or, and online & offline services (herein collectively referred to as "Company", "App", "We", "website", "Us or "Our"). This policy applies to all the existing and prospective customers who visit us or with whom we interact, including visitors to our website, service providers/receivers or other suppliers and others who interact with whether via our website or by corresponding with us or by other means (hereinafter collectively referred to as "Users"). For the purposes of the Privacy Policy, "You" or "Your" shall mean the person who is accessing the website or app including natural or legal person who accesses or uses the app or access in person and in the event that a natural person is representing a business entity or a body corporate, reference to such terms shall include a reference to such business entity and/or body corporate as well.

We collect information about you and/or your usage to provide better services and offerings. The Personal Information that we collect, and how we collect it, depends upon how you interact with us.

By using our services, you expressly and unconditionally agree to the terms and conditions of this Privacy Policy and consent to the usage, storage and handling of the personal information/ sensitive personal data submitted by You in accordance with the terms contained herein and as per regulatory requirement.

This policy applies only to the information We collect through Our website or app or in physical mode, in email, text and other electronic communications sent through or in connection therewith (collectively "User Information"). When You submit User Information on our application, it shall be deemed that You have granted Us the right to collect, store, process, handle and use such User Information, in accordance with this Privacy Policy (as amended from time to time).

We intend to protect the privacy of its users and members. The privacy of our website users, whether you are our former or existing registered user or merely a visitor to our Website, is important to us and we are strongly committed to your right to privacy and to keeping your personal and other information secure. We encourage you to read our privacy statement to understand what types of personally identifiable information we collect and how we use this information.

If you have any queries about this Privacy Policy, you can reach out to us at contact@oxyzo.in

2. What we collect

We collect various types of information from and about Users of Our services, including:

- If you choose to become a registered member of our Website, you are required to share your name, e-mail address, gender, date of birth, postal address, phone number, a unique login name, password, password validation, income tax details, marital status, family details, business information and other details

shared via application form or via email or via any other medium (Personally Identifiable Information).

- We may also collect other information specific to provide you service each time such as name, bank statements, KYC documents, personal details, business details, income tax details, marital status, family details and other information via application form or via email or via any other electronic medium or via printed form.

- When you visit the App, we use cookies, web beacons and other tracking technologies to automatically collect, store and use technical information about your system and interaction with our App.

-If you choose to sign in with your social media account to access the app, or otherwise connect your social media account with the services of the app, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the information that you make available to us through the social media interface.

3. How we collect

We typically collect personal data about from the information provided to us or others acting on our behalf when communicating or transacting with us in writing either by filling in forms or by corresponding with us by post, telephone, email or otherwise at the time of registering on the App or communicating with us. We may also automatically collect technical data about your equipment, browsing actions and patterns. In addition, your personal data may be received from third parties, such as public sources or information vendors with explicit prior consent of customer

Collection of data by Our app is need-based and with prior and explicit consent of the borrower having audit trail. Digital app cannot access mobile phone resources like file and media, contact list, call logs, telephony functions, *etc.* A one-time access can be taken for camera, microphone, location or any other facility necessary for the purpose of on-boarding/ KYC requirements only, with the explicit consent of the borrower.

No biometric data is stored/ collected in the systems associated with us or digital app, unless allowed under extant statutory guidelines and data is stored only in servers located within India, while ensuring compliance with statutory obligations/ regulatory instructions.

4. How we use the collected information

We will only use your personal data in a fair and reasonable manner, and where we have a lawful reason to do so. The Personal Information collected may be used for the following purposes:

- To communicate and correspond with you to serve you better;
- To maintain our records;

- Providing our services and products to you including to send you notifications of purchase, deal investment;
- Improving the App and its content to provide better features and services;
- Conducting market research and surveys with the aim of improving our products and services;
- Preventing, detecting, investigating and taking action against crimes (including but not limited to fraud and other financial crimes), any other illegal activities, suspected fraud, or violations of our 'Terms of Use' in any jurisdiction;
- Corresponding with third parties such as service providers, legal advisors and regulatory authorities to comply with any legal obligation imposed on us or in order to pursue our legitimate business interests.

In addition to the uses above, please note that we may also process your information where we are required by law to do so or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

5. Information Sharing

Your data may be shared to following with prior explicit consent :

- Our affiliates and group companies to the extent required for our internal business and/or administrative purposes and/or general corporate operations and for provision of services;
- Professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services and any of our service providers where such information is relevant to their performance of such services;
- Third parties including enforcement, regulatory and judicial authorities, if we determine that disclosure of your Personal Information is required to a) respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims; or b) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use or as otherwise required by law;
- In the event of a merger, acquisition, financing, or sale of assets or any other situation involving the transfer of some or all of our business assets we may disclose Personal Information to those involved in the negotiation or transfer.
- We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process

The collection and use of personal data should be limited to purposes: (1) which are stated in law and thus can be known to the individual at the time of the data collection; or (2) for which the individual has given consent.

Customer can revoke the consent and delete the data at any time given on the digital application.

6. Retention of Personal Information

Your Personal Information will not be retained by us any longer than, necessary for the purposes for which the Personal Information is processed and/or in accordance with legal, regulatory, contractual or statutory obligations as applicable.

To the extent of instructions on record management as stipulated in the Master Directions/Directions/Guidelines/Guidance issued by Reserve Bank of India, with reference to provisions of Prevention of Money Laundering (Maintenance of Records) Rule, 2005 (PML Rule, 2005) from time to time would be the directing force, We have defined a record retention period for your Information as Six (06) years from the date of last processing of your Information. At the expiry of such periods, your Personal Information will be deleted or archived in compliance with applicable laws. All physical data will be disposed of by shredding or otherwise making unreadable confidential records in accordance with applicable laws. All electronic data will be disposed in a responsible manner and in compliance with applicable laws with prior approval from CTO/CISO.

7. Accuracy of information provided

To serve you better we need accurate data. Please let us know if your personal data which we hold changes during your relationship with us. If at any time you would like to rectify, update or correct your Personal Information; or obtain confirmation on whether or not your Personal Information is processed by it; or access your Personal Information or exercise your right to data portability; or exercise your right to restrict the continuing disclosure of your Personal Information to any third party by us in certain circumstances, you are requested to contact us. We will require you to provide a valid proof of your identity, in order to ensure that your rights are respected.

8. Control over your personal information

You have the right to deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the app delete/ forget the data.

To act upon above, you can contact us at contact@oxyzo.in. Once we have received the withdrawal request, we will no longer process your information unless it is required to hold your data for a legal or regulatory purpose.

9. Promotional Initiatives

We may have presence on social networking websites including but not limited to LinkedIn, Facebook, Twitter, YouTube and blogs which are promotional and business initiatives to connect to a larger group of people. The domain links contained therein may either direct you to our Website or request your participation by way of feedback, suggestions. The Company in this regard fully

disclaims any liability (ies) or claim(s), which may arise by use/misuse of your feedback, suggestions, views, etc. on any of the aforementioned networking websites or blogs, by any third party whether or not known to Us.

10. Third Party Content

Please be aware that the App sometimes contains links to other sites that are not governed by this Privacy Policy. Users may be directed to third-party sites for more information, such as advertisers, blogs, content sponsorships, vendor services, social networks, etc.

We make no representations or warranties regarding how your information is stored or used on third-party servers. We recommend that you review the applicable privacy statements and policies of each third-party site linked from the App to determine their use of your personal information.

11. Intellectual Property Rights

All content on Our App, including graphics, text, icons, interfaces, audio clips, logos, images, reviews, comments, and software is the property of the Company and/or its content suppliers and is protected by Indian and international copyright laws and other applicable intellectual property laws. Any use, including the reproduction, modification, distribution, transmission, republication, display, or performance, of the content on this App can only be made with the express written permission of the Company.

12. Security of Data

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of the User's online session and to protect accounts and systems from unauthorized access. Our databases are protected from general employee access both physically and logically. However, no method of transmission over the internet or via mobile device, or method of electronic storage, is absolutely secure. Therefore, while We endeavour to use commercially acceptable means to protect Your personal information, We cannot guarantee its absolute security. You agree and confirm that Your User Information may be transferred, processed and stored. You hereby confirm that You have been made aware of the security measures undertaken by Us and You expressly consent to Us storing, handling, using Your User Information.

The processing of personal data in accordance with the above principles should be monitored by an appropriate, independent oversight authority, and by data subjects themselves. If there is any breach of security then we shall indemnify the user/ customer on actual loss basis.

13. Lawfulness

The collection and use of personal data should be done on a lawful basis in compliance with Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information), Rules, 2011 ("Rules"), Information Technology Act, 2000, technology standards/cybersecurity

stipulated by RBI or other agencies and other applicable regulations., e.g., involving consent, contractual necessity, compliance with legal obligation, protection of vital interests, public interest and/or legitimate interest.

14. Changes to Privacy Policy

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact grievanceredressal@oxyzo.in.

15. Governing Law and Dispute Resolution

This Policy shall be governed by and construed in accordance with the laws of India and subject to the provisions of arbitration set out herein, the courts at Delhi shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy. If any dispute arises between Us and the User in connection with or arising out of the validity, interpretation, implementation or alleged breach of any provision of the Policy, such dispute shall be referred to and finally resolved by arbitration in accordance with the Indian Arbitration and Conciliation Act, 1996 for the time being in force, which rules are deemed to be incorporated by reference in this clause.

16. Complaint/Concerns/Grievance

In accordance with the relevant provisions of the Information Technology Act, 2000 and Rules and RBI Guidelines on Digital Lending dated Sep 02, 2022, made thereunder, the name and contact details of the Grievance Officer who can be contacted with respect to any complaints or concerns including those pertaining to breach of Our Terms of Use, Privacy Policy and other policies or questions are published as under:

Grievance Redressal Officer: Ms. Pinki Jha

Email ID: grievanceredressal@oxyzo.in.

Contact Number: +91-7353013499

The Grievance Officer can be contacted between 10:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays.

17. Review

This policy maybe be amended periodically as and when statutorily required.
