



TrustIn

PRIVACY POLICY

DATE OF LATEST VERSION: 24/02/2020

TrustIn Software Services Private Limited (“We” / “Us”) are committed to upholding the privacy and security of the information supplied by every person (“User”/“You”) accessing and using any version of the TrustIn Software Services Private Limited website (“Website”) and / or web-based platform / application (“App”) on a compatible device. This privacy policy (“Privacy Policy”) briefly provides the manner in which We collect and use User information. By accessing or using the App, You signify that You have read, understood and agree to be bound by this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time without prior notice and such changes shall be effective immediately upon posting the updated or modified Privacy Policy on the website (i.e. <https://www.trustin.co.in/>) and we shall not be bound to inform you of any modifications hereof. Your access and use of the App following any such change constitutes your agreement to follow and be bound by this Privacy Policy, as updated or modified. For this reason, We encourage You to review this Privacy Policy each time You access and use the App. Your use of the App and any disputes arising therefrom, is subject to this Privacy Policy.

I. Information Collected:

We will collect personal information of the User. While some User information has to be mandatorily provided, others are optional and certain portions of the information will remain private and some will be displayed to other users; We shall always let the User know which is which. Additional information may be gathered during subsequent use of the App by the User, whenever the User chooses to provide it.

- A. Certain mandatory Personal Information (hereinafter defined), will be collected at the time of registration on the App which is required to enable the User to login to the App and for Us to: (i) verify the User’s identity; (ii) ensure accurate reporting and adjudication using, *TrustIn*, our proprietary technology and such additional rules that may be determined by: (a) Us; (b) our service partners; or (c) both (a) and (b); and (iii) safeguard against illegal activities like fraud, cheating, misappropriation, etc. Personal Information for the purposes of this Privacy Policy shall include, but not be limited to, information regarding your name, address, telephone number, date of birth, gender, e-mail address, and such other sensitive information that can identify you personally (“**Personal Information / Personal Data**”).
- B. In order to use the facilities and services available on the App, the User may be required, from time to time, to provide certain additional Personal Information after registration on the

App, which information shall be collected only upon receiving the User's express consent.

- C. We may also automatically receive and collect certain anonymous information in standard usage logs through the web server, including mobile-identification information obtained from the equivalent of "cookies" sent to the App, including mobile network information, standard web log information, traffic to and from our App, tracking inside the App and any other available information, from:
- o an IP address, assigned to the device used by the User;
 - o the domain server through which the User accesses the App and the functions and features therein; and
 - o the type of device such as computer, laptop, tablet, mobile phone, or any other device used by the User ("**Device**").
- D. We may also ask for additional Personal Information from time to time to meet new regulatory requirements or to provide you with other benefits of our services. As always, the information that we seek will only be for the purpose stated & in accordance to regulatory compliance. We use this information to contact you and undertake activities that you have specifically authorized us to do.

II. Method and manner of use of User information

- A. When the User registers with the App, We will use the information supplied by the User to set up encrypted, trauma-informed recording and reporting, provide transparent and real-time case progress updates, set up a two way communication channel, provide access to the company's safety policies and internal committee, provide access to a NLP based therapist/vernacular chatbot.
- B. We will also use the User information to enable activities and transactions that need to occur during the process of lending, such as:
- Generating and maintaining User profiles on the App;
 - Provide personalized features;
 - Facilitating support activities as needed;
 - Maintaining regular communications with the User concerning case progress updates, ongoing support for both complainant and respondent etc.
 - Modifying the App from time to time to cater to the User's interests;
 - Providing the App and the functions and features therein, efficiently;
 - To send you promotional emails containing information we think you will find interesting;
 - To contact you to fill out surveys and participate in other types of market research;
 - To maintain databases and back-ups of our Users;

- For the purpose of invoicing and service order processing;
- C. You acknowledge that you are licensing Us to use, modify, display, distribute and create new material from the Personal Information you provide through the App to render certain services on the App. By providing such information, you automatically agree, or promise that the owner of such information has expressly agreed to allow or license, as the case may be, Us to use the information in the manner set out in this Privacy Policy, without the payment of any fees. We may, to the extent permitted by law, also use, license, reproduce, distribute disclose, and aggregate, non-personally identifiable information that is derived through your use of the App and you hereby provide consent for the same.
- D. We may collect and process data about your use of our Website and App ("**Usage Data**"). The Usage Data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, product views, and Website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the Usage Data is our analytics tracking system. This Usage Data may be processed for the purposes of analyzing the use of the website and services. Under certain circumstances we may be required to share the Personal Information given by you with the third parties, to add value and improve the quality of products and services imparted by us to you. We shall take all reasonable steps to ensure that the confidentiality of your Personal Information is maintained by imposing strict confidentiality standards on all the third parties, from India as well as various member states of the European Union, or any other country with whom we part this Personal Information. We shall not allow any third parties to retain your Personal Information longer than what is warranted by the nature of goods provided and services rendered.
- E. We would also impart your Personal Information wherever it is required to be disclosed under law to any of the governmental agency or regulatory bodies. We may share aggregated information that may include Personal Information with third parties for analysis, demographic profiling, market studies, surveys, and other purposes having legitimate interests.
- F. We may collect and process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content such as your queries, queries related to the organization TrustIn Software Services Private Limited, and metadata associated with the communication. Our Website will generate the metadata associated with communications made using the Website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping, basis our legitimate interests, namely the proper administration of our Website and business and communications with users.
- G. We may also process your Personal Data or any part or item thereof, identified in this Privacy Policy, where necessary for the establishment, exercise, or defense of legal claims or enforcement of rights, whether in court proceedings or in an administrative or out-of-court procedure, or for compliance with a legal obligation to which we are subject. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal and fundamental rights and the legal rights of others.
- H. Please do not supply any other person's personal data to us, unless we prompt you to do so.

III. Sharing Of Information

We will not use User information for any purpose other than in connection with the App. We will not rent, sell or share User information and will not disclose any of the User's personally identifiable information to third parties, unless:

1. it is pursuant to obtaining the User's permission;
2. it is in connection with the services being rendered through the App;
3. it is to help investigate, prevent or take action regarding unlawful and illegal activities; suspected fraud, potential threat to the safety or security of any person, violations of TrustIn Software Services Private Ltd's terms and conditions, or as defence against legal claims;
4. it is a case of special circumstances such as compliance with warrants / statute / court orders / requests / order, notices from legal authorities or law enforcement agencies compel us to make such disclosure; and

IV. Information security

- A. The information provided by the User is stored in access controlled facilities with restricted access. User Information transmitted over the internet is protected through the use of encryption, using the Secure Socket Layer (SSL) or equivalent protocols.
- B. If a password is used to help protect User accounts and account information, it is the responsibility of the User to keep the password confidential. You have to ensure that You always log out, before sharing the device with a third party and it is advised that the User utilize a service to protect access to the User's Device.
- C. We shall use generally accepted industry standards to protect the User information submitted to Us, both during transmission and upon receipt. However, please be advised that, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, even though We strive to use commercially acceptable means to protect User information, We cannot guarantee its absolute security and your use of the App is at your sole risk and discretion. We also cannot warrant that such User information may not be misused in the event our safeguards and protocols are breached by a malicious third-party. Further, We are not liable to nor can we fully control the actions of other users with whom you may choose to share your information.
- D. The collection, usage, and sharing of User information by us shall be in compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and other applicable laws.
- E. Our Website may contain third-party platforms for various features and / or services, and such third party payment aggregator may collect your Personal Information for processing Information, and therefore, we advise that you read their privacy policies made available on their website.

V. Data retention and Back-up

We retain your Personal Information only for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which

we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

VI. Procedure For Removing User Name from the Records

- A. If and when a User is desirous of having his/her name and other details removed from our records, immediately upon receiving the User's written request to that effect We shall, subject to the terms hereof, remove and/delete all such information. Be aware that requesting deletion, unlike unsubscribing from specific e-mails, is total and irreversible. This means that We will also lose record of you having ever been on our systems, including any previous instructions you have given us opting out of specific emails types. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.
- B. If the User no longer wishes to receive notifications about our services, The User may change his/her notification preferences by contacting us at hello@trustin.co.in. We reserve the right to close the User account if the User opts out of receiving certain crucial notices that are required by Us to perform the services through the App.

VII. Procedure For Accessing and / or Correcting Inaccuracies In User Information

You shall have the right to view, amend, access, or delete the Personal Information that We / Website hold about you. To request access, please e-mail at _____.

The User may also correct or update any information online. In the event of loss of access details, the User may retrieve the same or receive new access details by sending an e-mail to: hello@trustin.co.in.

VIII. Procedure for restricting processing

In some circumstances you have the right to restrict the processing of your Personal Information. Those circumstances are: you contest the accuracy of the Personal Information; processing is unlawful but you oppose erasure; we no longer need the Personal Information for the purposes of our processing, but you require Personal Information for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your Personal Information. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

IX. Consent

You acknowledge that by using this Website and by providing your Personal Information, you consent to the collection and use of the Personal Information that you disclose on the Website in accordance with this Privacy Policy.

X. Links to Other Site

You agree and understand that the Website may contain links to other websites ("**Linked Sites**") on the Website which are operated by third parties and are not controlled by, or affiliated to, or associated with us unless expressly specified on the Website. We are therefore not responsible for

any form of transmission, transfer whatsoever, received by you from any Linked Site. Accordingly, we or Website does not make any representations concerning the privacy practices or policies of such Linked Sites or terms of use of such websites, nor do we control or guarantee the accuracy, integrity, or quality of the content available on such websites.

XI. Grievance Officer

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of our Grievance Officer are provided below:

NAME:	Meghana Srinivas
ADDRESS:	Meghana Srinivas, #775, SriLakshmi, 9Main, 3Block, Koramangala, Bangalore- 560034
TEL:	+91 9900092824
EMAIL:	hello@trustin.co.in