

**Privacy Policy for**  
**SIVI AI PLATFORM AND TECHNOLOGIES PRIVATE LIMITED**  
**(U72200DL2022PTC398271)**

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(SIVI AI Platform And Technologies Private Limited/ANVI) a company incorporated under the Companies Act, 2013 with its registered office B-70, Ground Floor, Paryavaran Complex, IGNOU Road Delhi South West Delhi DI 110030, India. (hereinafter referred to as "ANVI/ the company/We") This Policy describes how (SIVI AI Platform And Technologies Private Limited/ANVI collect, store, use and otherwise process your Personal Information through company website, and its application, m-site, chatbot, notifications or any other medium used by company to provide its services to you (hereinafter referred to as the "Platform"). By downloading and using application and, visiting the company website, or availing our product/services, you expressly give your consent to adhere this Privacy Policy ("Policy") and the applicable service/product terms and conditions. We value your trust in us and we do respect your privacy, maintaining the highest standards for secure transactions and protection of your personal information.

This Privacy Policy is published and shall be construed in accordance with the provisions of Indian laws and regulations including the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 under the Information Technology Act, 2000, the Aadhaar Act, 2016 and its Amendments, including the Aadhaar Regulations; that require publishing of the privacy policy for collection, use, storage, transfer, disclosure of Personal Information.

Personal Information means and includes all information that can be linked to a specific individual and also includes Sensitive Personal Information (all Personal Information which requires heightened data protection measures due to its sensitive and personal nature), both, hereinafter referred to as “Personal Information”. If you do not agree with this Privacy Policy, please do not use or access our Platform.

## Information Collection

The company/ANVI may collect your certain Personal Information when you use our services or Platform or otherwise interact with us during the course of our relationship. The company/ANVI collect Personal Information which is relevant and absolutely necessary for providing the services requested by you and to continually improve the company’s Platform and its application.

Personal and Sensitive Personal Information collected includes but not limited to:

- The “Personal Information” that We collect from You includes, but is not limited to, your name, account password, postal address, phone number, email address, contact preferences, ID proof (PAN, Passport, Voter ID etc.), bank account/credit card/debit card details, proof of employment, proof of educational background, and other information that would assist us in verifying your identity. Personal Information also

includes, among others, any information that does not reveal Your specific identity, such as, browser information, information collected through Cookies (defined below), pixel tags and other technologies, demographic information, etc

- Your device details such as device identifier, internet bandwidth, mobile device model, browser plug-ins, and cookies or similar technologies that may identify your browser/ Company Application and plug-ins, and time spent, IP address and location.

Information may be collected at various stages of your usage of the Company Platform such as:

- Visiting on the company Platform
- For doing registration on Company Platform as an “user” or any other relationship that may be governed by terms and conditions listed on Company Platform
- Transacting or attempting to transact on Company Platform
- Accessing links, e-mails, chat conversations, feedbacks, notifications sent or owned by Company Platform and if you opt to participate in our occasional surveys
- Otherwise dealing with any of the Company Affiliates/Entities/Subsidiaries/Associates
- While applying for career opportunities with company.

## Purpose and Use of Information

The company may process your Personal Information for the following purposes:

- Creation of your account and verification of your identity and access privileges,
- Provide you access to the products and services being offered by us, merchants, affiliates, subsidiaries, associates, or business partners,
- To conduct the KYC compliance process as a mandatory prerequisite as per the requirements of various regulatory bodies, including UIDAI under the Aadhaar Act and its Regulations,
- To process payments on your behalf and on your instructions; communicate with you for your queries, transactions, and/or any other regulatory requirement, etc.
- Enhancing your user experience in various processes/submission of applications/availment of product/service offerings by analysing user behaviour on an aggregated basis,
- To monitor and review products/services from time to time; customize the services to make your experience safer and easier, and conducting audits,
- To allow third parties to contact you for products and services availed/requested by you on, Company Platform or third-party links

- To carry credit checks, screenings or due diligence checks as lawfully required by us; detect and protect us against error, fraud; enforce our terms and conditions
- To inform you about online and offline offers, products, services, and updates; customizing and improving your experience by marketing, presenting advertising, and offering tailored products and offers
- To resolve disputes; troubleshoot problems; technical support and fixing bugs; help promote a safe service
- To identify security breaches and attacks; investigating, preventing, and taking action on illegal or suspected fraud or money laundering activities and conducting forensic audits as part of internal or external audit or investigation by Company or government agencies located within India or outside the Indian jurisdiction,
- Personal Information may be processed or stored in India or in other jurisdictions where ANVI or its service providers operate. Where Personal Information of individuals located in the European Union is transferred outside the EU, ANVI ensures that such transfers are subject to appropriate safeguards, including but not limited to:
  - Standard Contractual Clauses approved by the European Commission; or
  - Other lawful transfer mechanisms recognized under applicable data protection laws.

By using the Platform, you acknowledge and consent to such transfers in accordance with this Policy.

- To meet legal obligations.

While we may also process your Personal Information for other legitimate business cases, we ensure to take appropriate steps to minimize the processing to the extent possible, making it less intrusive to your privacy.

### **Lawful Basis for Processing Personal Information**

ANVI processes Personal Information only where it has a valid lawful basis to do so, including:

- **Consent:** Where you have explicitly provided consent for the processing of your Personal Information, including for cookies, marketing communications, and optional services;
- **Performance of a Contract:** Where processing is necessary to provide products or services requested by you;
- **Legal Obligation:** Where processing is required to comply with applicable laws, regulations, court orders, or regulatory directions;
- **Legitimate Interests:** Where processing is necessary for fraud prevention, security, platform integrity, service improvement, and risk management, provided such interests do not override your fundamental rights and freedoms.

Where processing involves **Sensitive Personal Information**, it shall be carried out strictly in accordance with applicable law and with enhanced safeguards.

## **Automated Processing and Artificial Intelligence**

The Platform uses automated systems and artificial intelligence technologies for purposes including identity verification, transaction monitoring, fraud detection, risk assessment, and service optimization.

Such automated processing:

- Is designed to support operational efficiency and compliance obligations;
- May involve profiling based on lawful parameters;
- Is subject to appropriate safeguards, including human oversight where required by applicable law.

You have the right to:

- Request meaningful information about the logic involved in automated processing;
- Request human intervention where legally required;
- Object to automated decision-making in circumstances permitted by law.

## Cookies or Similar Technologies

We use data collection devices such as "cookies" or similar technologies on certain pages of the Platform to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies are pieces of information that are stored on a User's computer when the User accesses a website. The Site may use temporary cookies to help you access some of the special functions within the database driven areas of the company's site. Once you leave Our Site, these cookies expire.

## Information Sharing and Disclosures

Your Personal Information is shared as allowed under applicable laws, after following due diligence and in line with the purposes set out in this Policy.

Personal Information will be shared, as applicable, on need-to-know basis, for the following purposes:

- For enabling the provision of the products/services availed by you and facilitating the services between you and the service provider, as requested
- For the Aadhaar authentication process by submitting Aadhaar information to Central Identities Data Repository (CIDR) and National Securities Depository Limited (NSDL)

- For complying with applicable laws as well as meeting the Know Your Customer (KYC) requirements as mandated by various regulatory bodies, whose regulated service/product you opt through our services/Platforms
- For completing a payment transaction initiated by you
- If it is required by financial institutions to verify, mitigate, or prevent fraud or to manage risk or recover funds in accordance with applicable laws/regulations
- For services related to communication, marketing, data and information storage, transmission, security, analytics, fraud detection, risk assessment and research
- enforce our Terms or Privacy Policy; respond to claims that an advertisement, posting, or other content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public
- If required to do so by law or in good faith we believe that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process
- If requested by government authorities for government initiatives and benefits
- For grievance redressal and resolution of disputes
- With the internal investigation department within company or agencies appointed by Company for investigation purposes located within or outside the Indian jurisdiction
- Should we (or our assets) plan to merge with, or be acquired by any business entity, or re-organization, amalgamation,

restructuring of our business then with such other business entity

While the information is shared with third parties as per purposes set out in this Policy, processing of your Personal Information is governed by their policies. Company ensures stricter or no less stringent privacy protection obligations are cast on these third-parties, wherever applicable and to the extent possible. However, company may share Personal Information with third-parties such as legally recognized authorities, regulatory bodies, governmental authorities, and financial institutions as per purposes set out in this Policy or as per applicable laws. We do not accept any responsibility or liability for usage of your Personal Information by these third parties or their policies.

## **Storage and Retention**

To the extent applicable, we store Personal Information within India and retain it in accordance with applicable laws and for a period no longer than it is required for the purpose for which it was collected. However, we may retain Personal Information related to you if we believe it may be necessary to prevent fraud or future abuse or if required by law such as in the event of the pendency of any legal/regulatory proceeding or receipt of any legal and/or regulatory direction to that effect or for other legitimate purposes.

Once the Personal Information has reached its retention period, it shall be deleted in compliance with applicable laws.

## Reasonable Security Practices

We work hard to protect Your Personal Information from unauthorized access to or unauthorized alteration, disclosure or destruction. Pursuant to the same, we Encrypt our services using secure server software, which is the industry standard and among the best software available today for secure transactions. In the event of a personal data breach that is likely to result in a risk to your rights or interests, ANVI shall notify affected users and relevant authorities in accordance with applicable law, within the prescribed timelines.

## Third-Party Products, Services, or Websites

When you are availing products and services of service providers on company Platform, Personal Information may be collected by respective service providers and such Personal Information shall be governed by their privacy policy. You may refer to their privacy policy and terms of service to understand how your Personal Information will be handled by such service providers.

Our services may include links to other websites or applications when you visit our Platform. Such websites or applications are governed by

their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser or on the m-site you are redirected to), use of any Personal Information that you provide on these websites or applications is governed by the privacy policy of the operator of the application/website, you are visiting. That policy may differ from ours and you are requested to review those policies or seek access to the policies from the domain owner before proceeding to use those applications or websites. We do not accept any responsibility or liability for usage of your Personal Information by these third parties or their policies.

## **Your Consent**

We process your Personal Information with consent. By using the Company Platform or services and/or by providing your Personal Information, you consent to the processing of your Personal Information by company in accordance with this Privacy Policy, including but not limited. If you disclose to us any Personal Information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy.

You may withdraw your consent at any time by contacting us or by using the consent management tools available on the Platform. Withdrawal of consent shall not affect the lawfulness of processing carried out prior to such withdrawal. Certain services may become

unavailable upon withdrawal of consent where such processing is necessary for service delivery or legal compliance.

## **Choice/Opt-out**

We provide all users with the opportunity to opt-out of receiving any of our services or non-essential (promotional, marketing-related) communications from us, after setting up an account. If you want to remove your contact information from all our lists and newsletters or discontinue any our services, please click on the unsubscribe button on the emailers.

## **Personal Information Access/Rectification and Consent**

You can access and review your Personal Information shared by you by placing a request with us. In addition, you may at any time revoke consent given to us to store your e-KYC information, collected as part of the Aadhaar-based e-KYC process. Upon such revocation, you may lose access to services that were availed on the basis of the consent provided. In some cases, we may continue to retain your information as per the 'Storage and Retention' section of this Policy. To raise any of the above requests, you may write to us using the contact information provided under the 'Contact Us' section of this Policy.

In case you wish to delete your account or Personal Information, please use the 'Contact Us' section of the Company Platform.

However, retention of your Personal Information will be subject to applicable laws.

For the above requests, Company may need to request specific information from you to confirm your identity and ensure authentication. This is a security measure to ensure that Personal Information is not disclosed to any person who does not have a right to receive it or is not correctly modified or deleted.

In cases where you need any further information specific to the product/ services that you are availing, we request you to read through the Terms and Conditions specific to the product/service which is easily accessible through the Company. Platform. For seeking any further information on the same, you can write to us at the details mentioned in the 'Contact Us' section of this Policy.

If you are located in the European Union, you also have the right to:

- Data portability;
- Restriction of processing;
- Objection to processing, including profiling;
- Lodge a complaint with a competent data protection supervisory authority.

## Children Information

We do not knowingly collect Personal Information from children below the age required to provide valid consent under applicable laws. Where Indian law applies, this age is 18 years. Where EU GDPR applies, parental consent may be required for users below the applicable age threshold and use of our Platform is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872. If you are under the age of 18 years then you must use the Platform or services under the supervision of your parent, legal guardian, or any responsible adult.

## Changes to Policy

Since our business changes constantly, so will our policies. We reserve the right, at our sole discretion, to change, modify, add, or remove portions of this Privacy Policy at any time without any prior written notice to you. We may, however, reasonably endeavour to notify you of the changes, it is your responsibility to review the Privacy Policy periodically for updates/changes. Your continued use of our services/Platform, following the posting of changes will mean that you accept and agree to the revisions. We will never make changes to policies in order to make it less protective of Personal Information already shared by you.

## Contact Us

In case you have any questions, concerns, or complaints regarding the processing of your Personal Information or this Privacy Policy you may write to Company's Privacy Officer using this email ID [compliance@anvi.ai](mailto:compliance@anvi.ai)

We are committed to answer your questions within the reasonable time limit. Any delay in the resolution time shall be proactively communicated to you along with reason of delay and expected resolution timelines.