Privacy Policy

Effective Date: 15 May 2025

1. Introduction

- (a) Infinity Fincorp Solutions Private Limited ("we," "our," or "us") respects your privacy and is committed to protecting your personal information. This Privacy Policy is applicable to all users of our website, all our potential and existing customers, job applicants and other individuals visiting or using any office, branch, website, portal, application or other platform provided by us ,or communicating with us over telephone, WhatsApp, face-to-face or any other method, or availing our offerings physically or through the online application forms and questionnaires (hereinafter referred to as "User" or "You" or "Your")
- (b) We take your privacy seriously and are committed to protect your personal data. This privacy policy ("**Privacy Policy**") describes how we collect, use, share, and safeguard your information when you visit our website www.infinityfincorp.com, use our services, or interact with us.
- (c) You are advised to carefully read the Privacy Policy before using this or any other platform, application or channels or communicating with us or sharing information/data. We will not be liable / responsible for any breach of privacy owing to your negligence. By using our website, you consent to the practices described in this policy.
- (d) If you do not agree with our privacy practices, please do not use or access this website

2. Information we collect

We may collect the following types of personal and non-personal information:

- (a) Personal Information: Name, contact details (email, phone number), address, date of birth, PAN, Aadhaar, employment details, and any other personal information you voluntarily provide.
- (b) Sensitive Personal Information: income information, bank account details, and any other sensitive personal information you voluntarily provide.
- (c) Usage Data: IP address, browser type, device information, pages visited, and other analytical data.
- (d) Cookies and Tracking Technologies: We use cookies and similar technologies to enhance user experience and analyse site usage.

3. Use of Your Personal Data

- (a) We may use and process your personal data for the following purposes:
 - (i) To provide and maintain our services, including to monitor the usage of our services.
 - (ii) To manage your Account: to manage your registration as a user of the service. The personal data you provide can give You access to different functionalities of the service that are available to you as a registered user.
 - (iii) For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the service we provide to you.
 - (iv) To contact you: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
 - (v) To provide you with news, special offers and general information about other goods, services and events which we offer that are like those that you have already purchased or enquired about unless you have opted not to receive such information.
 - (vi) To manage your requests: To attend and manage your requests to us.
 - (vii) For business transfers: We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our service users is among the assets transferred.
 - (viii) For other purposes: We may use your information for other purposes, such as data analysis, identifying usage trends, promotion and marketing of our offerings, determining the effectiveness of our promotional campaigns and to evaluate and improve our service, products, services, marketing and your experience.
 - (ix) For complying with applicable laws, preventing unlawful activities like fraud and spam, defending and initiating claims under law/equity/contract, and enforcing the terms of use and other contracts executed with you.

- (x) For information security measures and safeguarding our resources from harm and adverse effect.
- (xi) For purposes of your engagement with us as employee, consultant, or other similar arrangements
- (b) We may share your personal information with third parties as listed below in the following situations:
- (i) With Service Providers: We may share your personal information with our service providers to monitor and analyse the use of our service, to contact you and/or where it is necessary for the compliance of a legal obligation. However, we may disclose your personal information to HRMS and DMS systems for collecting and storing personal information
- (ii) For business transfers: We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business to another company.
- (iii) With Affiliates: We may share your information with our affiliates; in which case we will require those affiliates to honour this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- (iv) With business partners: We may share your information with our business partners to offer you certain products, services or promotions.
- (v) With your consent: We may disclose your personal information for any other purpose with your consent.
- (c) If you require further details about third parties, please contact us.
- (d) Neither Infinity nor any person acting on its behalf shall publish the sensitive personal data or information of the user

4. Retention of Your Personal Data

- (a) We will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy or as may be agreed with you elsewhere. We will retain and use your personal to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.
- (b) We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

5. Transfer of Your Personal Data

- (a) Your information, including Personal Data, is processed at our operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.
- (b) Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. We will carry out the transfer of sensitive personal data or information including any information, to any other body corporate or a person in India, or located in any other country, only if:
 - (i) it is necessary for the performance of the lawful contract between us or any other person acting on our behalf and the provider of information; or
 - (ii) where you have consented to data transfer
- (c) We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

6. Deletion and withdrawal of consent

- (a) You have the right to delete or request that we assist in deleting the personal data that we have collected about you.
- (b) Our service may give you the ability to delete certain information about you from within the service.
- (c) Where you delete your personal data or withdraw your consent for processing, we may not be able to provide you with our services, and you shall be responsible and liable for consequences emanating from deletion of your data or withdrawal of your consent.
- (d) You may update, amend, or delete Your information at any time by signing in to your account on our website, if you have one, and visiting the account settings section that allows you to manage your personal information. You may also contact us to request access to, correct, or delete any personal information that you have provided to us.
- (e) Please note, however, that we may need to retain certain information when we have a legal obligation or lawful basis to do so.

7. Disclosure of Your Personal Data

(a) Business Transactions

If we are involved in a merger, acquisition or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different Privacy Policy.

(b) Law enforcement

Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

(c) Other legal requirements

We may disclose Your Personal Data in the good faith belief that such action is necessary to:

- (i) Comply with a legal obligation.
- (ii) Protect and defend our rights or property
- (iii) Prevent or investigate possible wrongdoing in connection with the service.
- (iv) Protect the personal safety of users of our service or the public.
- (v) Protect against legal liability.

8. Commitment to Children

We do not knowingly collect or maintain information from those people that we know are under 18 years old and we do not specifically target this group in our marketing materials or other advertising. If you are providing personal data about children under 18 years, you represent that you are acting as their parent or legal guardian, and you are doing so in the best interest of the concerned child. If a user believes that we have collected information from a child, the user should forthwith contact our grievance office, on the details mentioned below.

9. Data Security

- (a) We implement appropriate technical and organizational measures to safeguard your data, including encryption, access control, and secure storage systems. However, no method of transmission over the internet is 100% secure.
- (b) We will implement appropriate technical and organizational measures to safeguard user data, including encryption, access, control, and secure storage systems, to protect the loss, misuse, and alteration of the information under our control. However, we will not be responsible for any breach of security or for any actions of any third parties or events that are beyond our reasonable control, including but not limited to acts of government, computer encryption or poor quality of your internet service or telephone service

10. Your Rights

Depending on applicable laws, you may have the right to:

- (a) Access and correct your personal data
- (b) Withdraw consent for processing of your sensitive personal data
- (c) Request data deletion
- (d) To exercise your rights, please contact us at [info@infinityfincorp.com]

11. Cookies Policy

Cookies are small text files that are placed on your device when you visit our website. We use two types of cookies: essential cookies that are necessary for the website to function, and non-essential cookies that help us collect website usage data, track user behaviour, personalize your experience, improve website functionality and show you targeted advertising. You may modify the cookie settings through your browser.

12. Third-Party Links

Our website may contain links to third-party sites. We are not responsible for the privacy practices or content of such websites.

13. Grievance Redressal

- (a) In accordance with Information Technology Act, 2000 and rules made thereunder, or in the event you wish to make a complaint regarding any violation of the provisions of the Privacy Policy, or in case of any complaint related to any other matter which concerns you, you can contact our grievance redressal officer. The name and contact details of our grievance officer are provided below.
- (b) In case of any grievances as regards misuse or processing of your personal information in a time bound manner, please contact Grievance Redressal Officer as stated in Grievance Redressal Policy.
- (c) Your complaint shall be addressed as per the Grievance redressal mechanism of the Company and the grievance officer shall redress your grievances expeditiously as per the <u>Grievance Redressal Policy</u>.

14. Links to Other Websites

Our Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

15. Changes to this Privacy Policy

- (a) We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.
- (b) We will let you know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "Effective Date" date at the top of this Privacy Policy.
- (c) You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. Continued use of our services after changes implies your acceptance.
- (d) If you wish to withdraw your consent for our use and disclosure of your information in the manner provide in this Privacy Policy, please reach out to our Grievance Officer.
- (e) In the event of a change in law applicable to data protection in India, you consent to the continued processing, use, storage, collection and disclosure of your personal information as detailed in this Privacy Policy and agree to provide such additional consents and approvals, in such form and manner, as may be requested. Should you choose not to provide such additional consents and approvals, we may not be able to provide you with our Services

16. Contact Us

(a) If you have any questions about this Privacy Policy or our data practices, please contact:

Infinity Fincorp Solutions Private Limited B-003, 215, Kanakia Atrium, Andheri - Kurla Rd, Vijay Nagar Colony, J B Nagar, Andheri East, Mumbai, Maharashtra 400093 Email: info@infinityfincorp.com

Phone: <u>022 4035 6600</u>

(b) When you contact us using the information provided above, you may share personal data, including sensitive personal data. By contacting us, you provide your explicit consent for us to collect, process, and store such data for the purpose of addressing your inquiry or request. You may withdraw this consent at any time by contacting us at the email address provided above. We will only retain your personal data for a long as necessary to fulfil the purposes for which it is collected or as required by applicable law.

17. Governing Law and Jurisdiction

This Privacy Policy shall be governed by the laws of India and the courts of Mumbai (India) shall have the exclusive jurisdiction to try any dispute arising thereof.