

Updated as on 14th September 2022

Privacy Policy of SalaryDay, Product of Goyal Associates Ltd.

Goyal Associates Ltd., a company incorporated under the laws of India and having its registered office at D-1014, Titanium City Centre, B/h IOC Petrol Pump, Near Sachin Tower Satellite, Ahmedabad – 380015, GUJARAT. ("**Company**").

1. INTRODUCTION

1.1. This Privacy Policy ("**Policy**") outlines Goyal Associates Ltd. ("**SalaryDay**", "**we**", or "**us**") practices in relation to the storage, use, processing, and disclosure of personal data that You ("**you**", "**your**", "**user**", "**customer**") have chosen to share with us when you download and use our mobile application "**SalaryDay**" or "**App**").

1.2. At SalaryDay, we are committed to protecting your personal data and respecting your privacy. Please read the following terms of the Policy carefully to understand our practices regarding your personal data and how we will treat it. This Policy sets out the basis on which any personal data we collect from you, we collect about you, or that you provide to us, will be processed by us.

1.3. The services we offer you on or through the App are referred to as "**Services**". Please note that unless specifically defined in this Policy, capitalised terms shall have the same meaning ascribed to them in our Terms and Conditions, available at ("[Terms & Conditions](#)"). Please read this Policy in consonance with the Terms.

1.4. By using all or a part of the Services, you agree and consent to the collection, storage, use, and disclosure of your personal data in accordance with this Policy.

2. THE DATA WE COLLECT ABOUT YOU

2.1. We collect, use, store, and transfer personal data about you to provide you with, or in connection with, the Services. Such personal data includes:

- a. Identity and profile-related data: This includes your first and last name, username or similar identifiers, gender, title, photographs, educational qualifications and background, marital status, feedback, and survey responses.
- b. Contact data: This includes your email addresses, phone numbers, and residential address.
- c. KYC data: This includes identification documents issued by the government or other authorities, and includes details of or pertaining to your Aadhaar, PAN card, voter ID, and ration card.
- d. Location data: This includes collection of current location details through GPS (Fine and Coarse GPS data fetched in the background).

- e. Transaction data: This includes details of transactions that may occur through the App or in connection with the Services. For example, transaction data may include the services you have sought or availed through the App or confirmations of such services.
- f. Financial data: This includes your past credit history, income details, details of loans issued or otherwise applied for through the App, payments and repayments thereof, bank account details, and bank account statements.
- g. Data from SMSs: We collect certain information from your SMSs. Please note that such data is limited to details of the transactions contained in the SMS. We do not collect, read or store bank OTPs, personal SMSs, account details, etc.
- h. Marketing and communications data: This includes your preferences in receiving marketing messages from us and our third parties and your communication preferences.
- i. Device data: This includes your IP addresses, browser types and versions, time zone settings, operating systems, and device information.
- j. Usage data: This includes information about how you use the Services.

2.2. Wherever required, we indicate the optional and mandatory fields. As a customer, you always have the option to not provide any information by choosing not to use a particular service or feature on the app. While you can browse some sections of our App without registering, few specific activities, such as availing of loans require registration and for you to provide the above details. The app will clearly display the personal information which is been collected from you, and you have the option to accept or deny to provide such personal information. However, this will limit the services provided to you on the app.

2.3. We collect your personal data to provide you with access to the App and Services. In certain cases, we are required to collect personal data as required by law, or under the Terms. If you fail to provide us that data as and when requested by us, we will not be able to perform our obligations under the arrangement we have with you or are trying to enter into with you (for example, to provide you with features of the Services). In this case, we may have to cancel or limit your access to the Services (or part thereof).

3. HOW WE COLLECT DATA ABOUT YOU

3.1. We use different methods to collect and process personal data about you. This includes:

- a. Information you provide us: This is the information (including identity, contact, KYC, financial, and device data) you consent to give us when you use our Services or when you correspond with us (for example, by email or chat, or through the App). It includes information you provide when you register to use the Services, use an App feature, share data through the App, or when you report a problem with the App and our Services. If you contact us, we will keep a record of the information shared during the correspondence.

- b. Information we collect about you and your device: Each time you visit the App or use the Services, we will automatically collect personal data through the use of tools like cookies. Information that we collect and its usage depends on how you manage your device's privacy controls. After you install the App, we store the collected information with unique identifiers associated with the device. We also collect the date related to performance of the App and other diagnostic data, in order to identify and resolve technical glitches as identified from time-to-time, to improve overall functionality of the App.

We collect your device's information to provide additional security with automatic updates. Through your device information we will be able to identify you as a device holder, thereby allowing us to improve our quality of services with enhanced customized user experience.

- c. Information we receive from other sources including third parties and publicly available sources: We will receive personal data about you from various third parties and public sources including our third parties, Google analytics for advertising and user analytics purposes, and other publicly available sources.
- d. Information we collect from your Transactional SMSs: Our app reads and transmits your transactional financial SMS data to our servers which helps us in identifying the various bank accounts that you may be holding, cash flow patterns, description and amount of the transactions undertaken by you. The collected information helps us to perform a credit risk assessment which will in turn determine your risk profile. This data also includes your historical data and may be collected even when the app is closed or not in use. This process will enable you to take financial facilities from the regulated financial entities available on the app. Note: We do not collect personal SMS or non-financial SMSs of the users.
- e. Information we collect from the Installed applications: We collect and transmit a list of the installed applications' metadata information which includes the application name, package name, installed time, updated time, version name and version code of each installed application on your device to assess your credit worthiness and enrich your profile with pre-approved customized loan offers. This data may be collected even when the app is closed or not in use.
- f. Camera usage: We require camera access to scan and capture the required KYC documents for assessment.
- g. Date collected from storage: We require storage permission so that your KYC and other relevant documents stored on your phone can be easily uploaded the correct KYC related documents for faster loan application details filling and disbursement process. This ensures that you are provided with a seamless experience while using the application.
- h. Non-financial, non-personal information: Whenever you use our App, it automatically tracks certain information which is used for internal research on our users' demographics, interests, and behaviour to better understand, protect and

serve our users and improve our services. This information is compiled and analysed on an aggregated basis.

We also collect your Internet Protocol (IP) address and the URL used by you to connect your computer to the internet or vice versa, your computer browser information, and your IP address.

Cookies are small data files that a Website stores on Your computer and helps in making our Website or App more user friendly. Your browser may give you the choice to accept or reject cookies and if you choose to reject, it may impact your access to few of the services on our website and app. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If we receive personal correspondence via emails, letters, etc., from you or other users about your activities on the website, we collect such information into a file specific to you.

- i. Production Server of SalaryDay: The contacts and other Personal Information collected from the users are upload in the production server of SalaryDay (which is owned by the company, Goyal Associates Limited).
- j. Test Server of SalaryDay: Test servers of SalaryDay are meant for internal use and are not used for production related data.

3.2. Please note that we do not have any control over personal data that you may choose to make publicly available. For example, if you post reviews, comments, or messages on public sections of the App or on an application store (such as the App Store or Play Store), you do so at your own risk. We are not liable for third-party misuse of such data.

4. HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

4.1. We will only use your personal data in accordance with the applicable law. Most commonly, we will use your personal data to provide you with the Services, or where we need to comply with a legal obligation.

4.2. You agree and acknowledge that by using our Services and creating an account on the App, you authorise us, our associate partners, and affiliates to contact you via email, phone, or otherwise. This is to ensure that you are aware of all the features of the Services and able to avail them.

4.3. In general, we use your personal data for the following purposes and activities undertaken without direct human supervision or control:

- To register you as a user of the App;

- To provide you with the Services;
- To administer and protect our business and the App, including troubleshooting, data analysis, system testing, and performing internal operations;
- To deliver content to you;
- To manage our relationship with you, including notifying you of changes to any Services;
- To monitor trends so we can improve the App and Services;
- To improve our business and delivery models;
- To enforce our Terms;
- To perform our obligations that arise out of the arrangement we are about to enter or have entered with you;
- To respond to court orders, establish or exercise our legal rights, or defend ourselves against legal claims.

5. HOW WE SHARE YOUR PERSONAL DATA

We will share Your information with only our registered third parties including our regulated financial partners for provision of Services on the App. We will share Your information with third parties only in such manner as described below:

5.1 NBFCs or Third-party Partners: We disclose and share Your information with the financial service providers, banks or NBFCs, our third-party partners, consultants, lawyers, auditors, etc. to facilitate a loan or purchase of a product. We share Your information with our third-party partners in order to conduct data analysis in order to serve You better and provide Services on our App. We may also share this information with other entities in the SalaryDay group in connection with the abovementioned purposes.

5.2 Disclosing data without prior intimation: We may disclose Your information, without prior notice, if we are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of Us, Our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5.3 Sharing data with technical partners: We may disclose your data / information with other technology partners to track how the user interaction with the App on our behalf.

5.4 Disclosing to Credit Bureaus: We will disclose the information to our credit partners like Credit Bureaus, to perform credit assessments which will help us in analysing credit worthiness of your profile.

5.5 Disclosing with other entities: We and our affiliates may share Your information with other business entity, in case of merger, or acquisition by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. On

happening of such transaction, any business entity (or the new combined entity) receiving any such information from SalaryDay shall be bound by this Policy with respect to your information.

We will share your information under a confidentiality agreement with the third parties and restrict use of the said Information by third parties only for the purposes detailed herein. We warrant that there will be no unauthorised disclosure of your information shared with third parties.

5.6 Link to third-party SDK:

The App linked to a registered third-party SDK which collects data on our behalf and stores in a secured server. The data is used to perform a credit risk assessment. The stored data is protected and stored by application-level encryption. They enforce key management services to limit access to data.

Our third-party service provider employs separation of environments and segregation of duties and have strict role-based access control on a documented, authorized, need-to-use basis. We ensure that our third-party service provider takes extensive security measures in order to protect your personal information against loss, misuse or alteration of the data.

Our third-party service provider provides hosting security. They implement industry-leading anti-virus, anti-malware, intrusion prevention systems, intrusion detection systems, file integrity monitoring, and application control solutions.

By using the App, you hereby grant your consent to SalaryDay to share/disclose your Personal Information

- (i) To the concerned third parties in connection with the Services;
- (ii) With the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities, in accordance with applicable laws of India.

Please note that your Aadhaar number shall never be disclosed.

In case we use or disclose your information for any purpose not specified above, we will take your explicit consent.

6. ACCESS AND UPDATING YOUR PERSONAL DATA

You hereby warrant that all personal data that you provide us with is accurate, up-to-date, and true. When you use our Services, we make best efforts to provide you with the ability to access and correct inaccurate or deficient data, subject to any legal requirements.

7. DATA RETENTION

7.1 You agree and acknowledge that your personal data will continue to be stored and retained by us for as long as necessary to fulfil our stated purpose(s) and for a reasonable period after termination of your account on the App or access to the Services. Your data is stored in our servers which are located in India.

7.2 Your Privacy Controls: You enjoy specific controls regarding the information we collect and use:

Device-level settings: Your device may have controls that determine what information we collect. For example, you can modify permissions on your device for access to Camera or Audio permissions.

Delete the App from your device: You can delete the app from your device. By doing so, you will no longer be able to access our in-app services.

Request to delete: You are also authorised to raise a request with us to modify/edit or delete/withdraw Personal Information partially/fully, shared by you. You can do this by raising a request to our Grievance Officer, whose contact details are at the end of this page. Please note that deleting or withdrawing information may affect our Services offered to you. In case of modification, you must submit required supporting documentation for the purpose of verification by the company.

8. DATA SECURITY

8.1 We implement appropriate security measures to protect your personal data from unauthorised access, and follow standards prescribed by applicable law, including the Information Technology Act, 2000 and rules thereunder. We implement reasonable physical, administrative and technical safeguards to help us protect your information from unauthorized access, use and disclosure. We also ensure that our registered third-party service providers protect such information from unauthorized access, use and disclosure.

8.2 Our App has stringent security measures in place to protect the loss, misuse and alteration of information under control. We use Secure Sockets Layers (SSL) based encryption, to transmit the information, which is currently the appropriate level of encryption practiced in India as per applicable law.

8.3 We aim to protect from unauthorized access, alteration, disclosure or destruction of information we hold, through various practices, such as:

- Encryption when the data is in transit;
- To protect your account, we offer OTP verification.
- Regularly review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;
- Restricting access to personal information to our employees, contractors, and agents based on the requirement. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
- Periodical review of this Privacy Policy to ensure that we process your information in ways that comply with it.
- We ensure that Aadhaar number is not disclosed in any manner.

8.4 Data Protection Laws: Data protection laws vary among countries. We and our affiliates or third-party service provider, maintain your information on servers located in India. We also comply with certain legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000, and rules made thereunder.

8.5 Complaints: We respond to the formal written complaints by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

9. LINKS TO THIRD PARTY WEBSITES

Our Services may, from time to time, contain services provided by or links to and from the websites of our partner networks, service providers, financial institutions, advertisers, and affiliates ("**Third Party Services**"). Please note that the Third Party Services that may be accessible through our Services are governed by their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through such Third Party Services. Please check their policies before you submit any personal data to such websites or use their services.

10. CHANGE IN PRIVACY POLICY

10.1. We keep our Policy under regular review and may amend it from time to time, at our sole discretion.

10.2. The terms of this Policy may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by email. The new Policy may be

displayed on-screen and you may be required to read and accept the changes to continue your use of the Services.

11. YOUR CONSENT

By using the App and by providing your information, you consent to the collection, sharing, transmission, disclosure and usage of the information that you disclose on the App in accordance with this Privacy Policy.

12. GRIEVANCE OFFICER

You may contact our Grievance Officer, established in accordance with the Information Technology Act, 2000 and rules made thereunder, with any enquiry relating to this Policy or your personal data.

Name: Imtiyaz Ahmed

SalaryDay – Goyal Associates Limited.

Address: P.No.134 141, 6-3-347/22/6, Sri Durga Tulasi Apartments,

Dwarakapuri Colony, Punjagutta, Hyderabad, Telangana, 500082

Email Address: grievanceofficer@salaryday.in

Phone No: 8977008131

Time: Monday to Saturday – 10am to 7pm