

DATA PRIVACY POLICY**Overview**

This privacy policy ("**Policy**") is applicable to all those persons(s) whose Personal Information and/or Sensitive Personal Data/Information is collected, stored and processed by Kanji Forex Private Limited ("**Company**") ("**You**" and/or "**Your**"). All partner entities and any third-party working with or for the Company, and who have or may have access to Information, will be expected to have read, understood and be in compliance with this Policy.

By visiting our website or using our Services or by giving us Your Information, You accept the collection and processing of Your Information as described in this Policy.

At Kanji Forex Private Limited, we are committed to the privacy of our users, and we deeply care about the personal information that You share with us. We handle and process Your data in a secure manner as per the guidelines mentioned below.

The terms "we", "us" and "our" shall mean the website, domain, or platform and the Company, as the context so requires. This privacy policy will be applicable to the Company to the extent applicable under applicable laws and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("**SPDI Rules**").

For the purposes of this Policy the term "**Information**" shall include both 'Personal Information' ("**PI**") and 'Sensitive Personal Data/Information' ("**SPDI**"), as under the SPDI Rules.

The term 'Sensitive Personal Data/Information' shall mean information relating to (i) financial information such as bank account or credit card or debit card or other payment instrument details; (ii) physical, physiological and mental health condition and medical records or history; (iii) sexual orientation; (iv) genetic or biometric information; (v) racial and ethnic origin; (vi) any other details relating to the above provided to the Company; and (vii) any information received pursuant to the above by the Company for processing, or storing such information under a lawful contract or otherwise;

Provided that any Information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force will not be considered to be SPDI.

Consent

Please read the Policy carefully. By accessing this website, You hereby represent that You understand and agree to the practices and policies set forth in this Policy and that You understand and agree to the terms of this Policy. You hereby acknowledge and expressly consent to our collection, use, processing, storing, disclosure and/ or transfer of Your Information as described hereinunder. By continuing to use our Services or accessing this website, You confirm that You are 18 years of age or older. If You do not agree to the terms of this Policy, please do not use this Website.

Third Party Websites

Please note that this Policy does not apply to websites maintained or services rendered by other companies or organizations with which we partner with and/or link, and we are not responsible for any Personal Information You submit to third parties via our services and/ or website. Please ensure that You read the privacy policy of such third parties before submitting Your details.



1. COLLECTION, USE & PROCESSING OF YOUR PERSONAL INFORMATION: Experience value

Personal Information that we collect:

For the purposes of this Policy, "Personal Information" (with reference to the SPDI Rules) is any data which relates to an individual who may be identified from that data (including, but not limited to, name, address, telephone number, email address, username and password, photograph, government-issued identifier, or any other data used or intended to be used to identify, contact or precisely locate an individual or device), that You voluntarily submit it to us (including in relation to enquiring about career opportunities or applying for a job through our website), or from a combination of a set of data, and other information which is in possession of the Company.

You always have the option to not provide Information, however, by choosing the option of not providing Information, You may not be able to continue to enjoy the full extent of Website.

Please note that we collect certain type of Information automatically when You visit our website. This Information does not reveal Your identity (like name, email address etc.) but may include usage and device information like IP addresses, browser characteristics, language preference, referring URLs, device location etc. We gather this information to maintain security and operations of the services rendered and for our internal analytics and reporting purposes. We collect this information through 'cookies' and similar technologies which is general industry practice. 'Cookies' are small text files that we place in Your device that You use to access our website. This is done to recognize Your device during a session or in Your future visits to our website, primarily in order to provide better user experience.

The Company will take reasonable steps to accurately record the Information that You provide to us and any subsequent updates.

2. PURPOSE OF COLLECTING YOUR INFORMATION

(a) Personal Information will be used We will use Your Information in relation to:

- (i) responding to the enquiries made by You (including managing or initiating any communications with You including, but not limited to, Your preference to contact us *vide* the 'Contact Us' section.);
- (ii) contacting You and responding to Your questions or requests;
- (iii) gathering information such as source of traffic to the website, time spent on each page, understanding which parts of the website are visited and how frequently;
- (iv) determining what is most effective about our website, and to identify ways to improve it by providing better usability, troubleshooting and site maintenance; or
- (v) Providing services to You as offered by the Company.

(b) Legal basis for processing Your Personal Information:

For the purposes of this Policy, the term "**Processing**" shall refer to any action performed on Information, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing, uploading or deleting



We collect, store, use, share, transfer, analyse, process, or otherwise handle Personal Information for the purposes mentioned above, in accordance with applicable legal requirements: (a) for legitimate business; or (b) compliance purpose; or (c) if individuals have provided consent to the same or any relevant basis as defined by the applicable laws or regulations; or (d) when it is necessary for the performance of a contract to which You are the party.

The Personal Information shall be retained by us for such periods in accordance with applicable law or for legitimate business purposes. When the Company no longer needs to keep Personal Information for the purposes, for which they are held, we will delete the same.

It is Your sole responsibility to ensure that the Information being shared with us is accurate. The Company shall not be responsible for the authenticity or correctness of the Personal Information supplied by You. Upon becoming aware or being notified about such inaccuracy by You, the Company will either erase the Personal Information or require You to review and rectify the inaccuracy without delay.

3. CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION:

By using this website or by giving us Your Personal Information, You have: (a) read and accepted the terms set out hereunder, and (b) provided Your express informed consent to us collecting, storing, processing, transferring, and sharing Your Personal Information as set out in this Policy.

You have the option of not providing us with Your Personal Information and may also withdraw Your consent provided by writing to us at [forex@kanji.in].

Kindly note that if You are unable to share Information with us, we will be constrained in the level of services provided by us to You as discussed above.

4. DISCLOSURE OR SHARING OF PERSONAL INFORMATION:

Your Personal Information will not be sold to third parties under any circumstances. We may use and/or share or disclose Your Information within the Company or with any of its holding/parent entity, subsidiaries, affiliate(s), their business partners, investors, service vendors, authorized third-party agents, contractors, regulatory or governmental authorities (a) for and in relation to items as set out in Paragraph 2(b) above; or (b) if third-party service providers engaged by us, require access to Your Personal Information to perform their functions. We may disclose and/or transfer Your Information in connection with the sale or merger of the Company or any transaction that involves the sale or assignment of some or all of our assets or for the purposes of re-organization, amalgamation, restructuring of business.

We may also disclose Your Information to law enforcement offices, government authorities or agencies, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to enforce this Policy, or as otherwise required by law or permitted by law. Such parties will not publish your Information.

We may also disclose Your Information if required to do so by law or in good faith belief that such disclosure is reasonably necessary to respond to summons, court orders, or other legal process, government authorities, courts, dispute resolution bodies, our regulators, auditors, and any party appointed or requested by our regulators to carry out investigations or audits of our



activities. In the foregoing circumstances, we shall not be under any obligation to intimate or notify You, or to obtain Your consent, for such disclosure, sharing or transfer of Your Information.

If the Company shares Your Information to the third parties as mentioned above for purposes stated in this Policy, the Company shall ensure that such party adheres to the same level of data protection as the Company, stipulated under the SPDI Rules. Your Information will be adequately protected and processed only for specified and reasonable purposes in a manner that is fair, transparent and has a lawful basis, and will be stored for no longer than is absolutely necessary under law.

5. YOUR RIGHTS WITH RESPECT TO INFORMATION

You also have an option to access Your Personal Information in order to view, add, alter, update and/or modify Information provided to the Company and may reach out to our Grievance Officer, the details of which are mentioned below.

6. REASONABLE SECURITY MEASURES:

The Company uses and complies with commercially reasonable security practices and measures for the protection of Information and have in place, information security policies that contain technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business.

7. HOW TO CONTACT US:

If You have a privacy concern or complaint or a question regarding this Policy, please direct it to our Grievance Officer:

Name: Mr Jignesh J Chacha
Email: forex.andheri@kanji.in

The Grievance Redressal Cell shall redress Your grievances within one month from the date of receipt of the grievance.

8. CHANGES TO THIS PRIVACY POLICY:

The Company may decide to update this Policy from time to time to ensure that the same stays relevant and adheres to extant applicable regulatory requirements and standards. The updated version of this Policy will be identified by the "Revised Date" and "Version" mentioned at the bottom of this document.



FOR KANJI FOREX PVT. LTD.

Director