



Privacy Policy

Applicable for Customers using Dhani Pay Prepaid Account and Dhani Pay Card issued by TranServ Pvt. Ltd.

It is also applicable to customers using Udio Wallet and Udio Card issued by TranServ Limited. Please note that TranServ was issuing prepaid instruments under the name 'Udio' and has now renamed its products & services under the brand 'Dhani Pay' with effect from 10 April 2019. Customers registered for Udio Wallet, Udio Card and / or Udio Services will be governed by the following privacy policy applicable for Dhani Pay Prepaid Account, Dhani Pay Card and/or Dhani Pay Services respectively.

Please review this privacy policy carefully before using the mobile app/site)

Last updated April, 2019

TranServ Limited ("TranServ") is committed to respecting and safeguarding the privacy of all its service recipients and users of its mobile app/website("Site"). This privacy policy ("Policy") discloses the practices and

policies adopted by TranServ for collecting, storing, retrieving or using personal data and sensitive personal data or information it may receive from its users of the mobile app/Site. All Terms and Conditions of use of the mobile app/Site are incorporated in this Policy by reference. The Policy seeks to comply with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, as amended (“Rules”).

This Policy is applicable to all personal and sensitive personal data or information that is disclosed by or obtained from any person who visits or uses or accesses the mobile app/Site (“User”).

TranServ reserves the right to modify or review the provisions in this Policy without prior notice and the revised Policy will be in effect from the day of uploading. Therefore, Users are requested to periodically visit the mobile app/Site and review the Policy.

1. Definitions

“Applicable Law” means all applicable statutes, acts of Indian legislature, ordinances, rules, bye-laws, regulations, notifications, circulars, guidelines, policies, directions, directives and orders of any government, statutory authority, regulatory authority, tribunal, board or court in India; “General Information” shall have the same meaning ascribed to it in clause 2.5 of the Policy.

“Personal Information” shall mean information disclosed by or obtained from any User and includes name, age, occupation, marital status, email, residential address, telephone number, SMS messages, payment processing details, and any other personal details capable of identifying such a person.

“Sensitive Personal Information” shall, excluding any information that is freely available or accessible in the public domain or is furnished under Applicable Laws, mean the following information:

- a. Password;
- b. SMS messages
- c. Contact details

- d. sexual orientation; and
- e. financial information such as bank account or credit/debit card details or other payment instruction details.

“**User**” means any person who visits or uses the mobile app/Site or has an account at the mobile app/Site.

2. Collection of Information

2.1. A User may be required to reveal Personal Information or Sensitive Personal Information for the purposes of (a) browsing through the mobile app/Site; (b) opening an account/registering at the mobile app/Site; (c) applying to purchase products/avail services at the mobile app/Site; or (c) purchasing products/ availing services at the mobile app/Site.

2.2. Prior to furnishing Personal Information/ Sensitive Personal Information to TranServ for any one or more of the purposes described above, a User must grant consent to TranServ for using the Personal Information. The Personal Information/Sensitive Personal Information will be used only for the purposes set out in Clause 3 of the Policy. If the User does not wish to provide such Personal Information/ Sensitive Personal Information, the User must not proceed with using the mobile app/Site.

2.3. TranServ will collect Personal Information/ Sensitive Personal Information only for a lawful purpose connected with a function or activity of TranServ, for which activity the Personal Information/ Sensitive Personal Information is reasonably considered necessary.

2.4. TranServ will not be responsible for the validity, accuracy, correctness or completeness of the Personal Information/ Sensitive Personal Information provided by the User, or any consequences arising in relation to the invalidity, inaccuracy, incorrectness or incompleteness of the Personal Information/ Sensitive Personal Information. The User must update the Personal Information/ Sensitive Personal Information to ensure that such information is valid, accurate, correct and complete.

2.5. While browsing through the mobile app/Site, the mobile app/Site server may automatically record some general information about User’s visit, such as the date and time of visiting the mobile app/Site, the IP address being used, GPS/Cell tower location, the type of browser being used, browser language etc. (“General Information”). Such General Information collected is not Personal Information/ Sensitive Personal Information for the purpose of this Policy.

2.6. TranServ reserves the right to use General Information collected by it for any purpose whatsoever including statistical analysis, tracking overall traffic patterns and marketing and promotional purposes. Consequently, TranServ may share such General Information or any analysis with any third party, at its discretion.

2.7. TranServ may have obtained with your consent certain additional information, from your mobile device like device location, device information (including storage, model, installed apps, wifi, mobile network) transactional and promotional SMS (originating from Alphanumeric senders), communication information including contacts and call logs ,for statistical modeling, credit scoring and any other purpose that will help us in providing you with optimal and high quality service.

3. Use of Personal Information and Sensitive personal Information

Personal Information/ Sensitive Personal Information disclosed to TranServ by a User will be used by TranServ for one or more of the following purposes:

- a. to verify the User's identity
- b. to maintain, protect, provide and improve services/products to the User;
- c. to assist TranServ in creating content that is relevant to the User; d. to maintain a database of all such information collected from the User;
- e. to safeguard against illegal activities like fraud, cheating, misappropriation, etc.
- f. to evaluate and administer the mobile app/Site and resolve any problems that may arise with usage of the mobile app/Site;
- g. to notify User of any major changes, for customer service purposes, providing information/updates about regulations, features, services, etc
- h. to keep a record of transaction history of the User as governed by existing law or policy.
- i. to determine the User's eligibility for using TranServ's products and services and such eligibility criteria may be determined by: (i) Us; (ii) our partners; or (iii) both (i) and (ii)

4. Retention Period

The personal Information/ Sensitive Information disclosed by a user will be retained by TranServ, as long as the purposes for which the such information were collected continue or for such period as prescribed under the applicable law.

5. Cookies

5.1. When a User visits the mobile app/ Site, one or more cookies shall be

sent to the computer or the device being used by the User to visit the mobile app/Site. Cookies are used to improve the quality of the services provided by TranServ through the mobile app/Site, including for storing User preferences, improving search results and tracking User trends.

5.2. Users will always have the option of disabling cookies via their browser preferences. However, Users are advised and made aware that if they disable cookies on their browser, some parts of mobile app/Site may not function as effectively.

5.3. TranServ may use Google AdWords and/or other such services to advertise on third party websites to previous visitors to the Site. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Google's use of the DART cookie enables it to serve ads to its Users based on their visit to Site and other websites on the Internet. Users may opt out of the use of this DART cookie by visiting Google's privacy document.

6. Information Sharing and Disclosure of Personal Information and Sensitive Personal Information

6.1. Only Persons authorized by TranServ shall have access to Personal Information/ Sensitive Personal Information disclosed to TranServ. User grants consent to TranServ for sharing Personal Information/ Sensitive Personal Information with persons who are associated with TranServ.

6.2. Notwithstanding anything contained in this Privacy Policy, TranServ reserves the right to disclose any Personal Information/ Sensitive Personal Information that may be required to be disclosed under Applicable Law, without prior notice or consent of the User.

7. Disclosure to Third Party

7.1. In case the information is being collected and retained by a third party, on behalf of TranServ, TranServ shall obtain prior permission from the User before transfer of information to any third party, unless such disclosure is necessary for compliance of a legal obligation. Such obligation is also not applicable in case such information is being transferred to a government agency, when a request for such transfer has been made by such government agency to TranServ.

7.2. TranServ may transfer Personal Information/ Sensitive Personal Information to any company or person located in India or any other country only if it is necessary for the performance of lawful contract between TranServ and such person/company, provided the same level of data protection will be adhered to by the other person/ company. TranServ cannot guarantee that such parties will keep the Personal

Information/ Sensitive Personal Information confidential and TranServ will not be liable in any manner for any loss of confidentiality attributable to such third parties.

7.3. TranServ does not rent, sell or share the information being collected from Users to third parties for consideration.

8. Security

8.1. TranServ has taken all reasonable measures and precautions to keep the Personal Information and Sensitive Personal Information safe and secure and to prevent any unauthorized access to or misuse of the same.

8.2. TranServ may employ procedural and technological security measures, consistent with the relevant industry practice. Such measures are reasonably designed to help protect the Personal Information/Sensitive Personal Information from loss, unauthorized access, disclosure, alteration or destruction. TranServ may also use encryption, secure socket layer, firewalls, internal restriction, password protection and other security measures to help prevent unauthorized access to the Personal Information/Sensitive Personal Information.

8.3. TranServ shall not be liable to any User for any loss, damage (whether direct, indirect, consequential or incidental) or harm caused to the User due to the unauthorized access or misuse of the Personal Information/ Sensitive Personal Information by any third party (beyond the control of TranServ).

9. Linking to other mobile app/sites

TranServ is not responsible for the privacy practices or the content of any other mobile app/websites for which links may be provided on the mobile app/Site or which provides links to the mobile app/Site. By clicking on a link, logo or other such items, or using certain services available on the mobile app/Site, the User may no longer be on the mobile app/Site and in such circumstances the privacy policy (if any) of such other mobile app/website shall apply. TranServ encourages Users to read the privacy policy/ statement of such other mobile apps/websites.

10. Aggregate Information

TranServ may track the total number of visitors, IP addresses, geographical location, age group and gender of Users, etc. and may analyze this data for trends and statistics in the aggregate. However, such information will be maintained, used, and disclosed in aggregate form only and will not contain any Personal Information/Personal Sensitive Information. TranServ may use such information to analyze various trends and gather broad demographic information for aggregate use. TranServ may share this aggregate information with third parties to assist them in targeting advertisements to appropriate

audiences.

11. Contact Us

If a User wishes to report a violation of the Terms of Use or this Policy and has any questions or needs assistance, please contact us at support@dhani.com

12. Updates

TranServ reserves the right to update / change / alter or update the Terms of User or this Privacy Policy from time to time to incorporate necessary changes in technology, applicable laws or any other variant. Any update made will be effective immediately. Use of the services provided by TranServ after such update will be deemed acceptance of such changes. Users are advised to review this Privacy Policy periodically on the Site to ensure that you are aware of the latest version.