

Privacy Policy

This Privacy Policy is published by **Helloaaye Management Private Limited**, a company incorporated under the Companies Act, 2013, having its registered office at B-29, BAGWATI GARDEN SHISHA GODOWN ROAD, DWARKA MOR, NEWDELHI-110059 (CIN) U6619DL2023PTC420905 (hereinafter referred to as "Company" and or "Hello Aaye" which term, unless repugnant to the context or meaning thereof, shall mean and include its directors employees and associates to provide the privacy policy that will be applicable in the context of the Hello Aaye (hereinafter referred to as its "**Application / Website**") and govern the persons downloading, signing up/registering on the Application / website and purchasing the financial products as presented by Advisor through the Application / Website (hereinafter referred to as "**End Customer**") or downloading signing up/registering and/or promoting financial products of Company's clients products and services on the Application / Website to the End Customer (hereinafter referred to as "Advisors") (End Customer and **Advisor/s** shall collectively be referred to as "Users").

This Privacy Policy is published in accordance with the relevant provisions of the Information Technology **Act**, 2000 (hereinafter referred to as the "Act"), Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (hereinafter referred to as the "**IT rules**") and the Information Technology (Intermediary Guidelines) Rules 2011 (hereinafter referred to as the "Intermediary Rules") and such other applicable laws. Through this Privacy Policy, Company provides information about the details it collects from Advisors (including but not limited to personal and sensitive information as described in the IT rules) hereinafter referred to as "Information" (It is explicitly clarified that the term "**Information**" shall mean and include the information described in clause 2 of this Privacy Policy), the purpose of such collection, disclosure of data, the mode of removal or updating Advisor Information, practices and safety measures and grievance redressal mechanisms in the following manner:-

- Company is engaged in the business of advertising the financial products on its Application / Website to the Advisors to enable them to promote the same to End-Customers. For more information about the products please go through the Application / Website.
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- Company collects the following information from the End Customer for the following purposes:
 - Mobile No. – To register end-customer details on the Application before they can proceed to apply to the Products on the Application / Website.

- PAN no. – For KYC compliance and to register end-customer details on the Application / Website before they can proceed to apply to the Products on the Application / Website.
- Name as per Aadhaar Card – for KYC compliance and to register end-customer details on the Application before they can proceed to apply to the Products on the Application / Website.
- Email Address – for communication purposes to register end-customer details on the Application / Website before they can proceed to apply to the Products on the Application / Website.
- Pin-code - To register end-customer details on the Application / Website before they can proceed to apply to the Products on the Application / Website.
- Company neither rent's nor sell's User personal information in personally identifiable form to anyone. Company shares User's personal information in personally identifiable form with third parties only as described in this Privacy Policy. The Information is stored by Company (including by its associates/employees and auditors/attorneys hereinafter referred to as "Authorised Personnel" and third party software enabled on the Application in its electronic and physical databases. However, it is hereby clarified that:
 - Reasonable safety practices as per Indian standards are enabled on the Application / Website (and the Company Application / Website is encrypted), the electronic and physical databases to protect the data collected by Company and to prevent unauthorized access to third parties.
 - The Authorised Personnel will be provided access to the data only on a need to know basis and with an obligation cast on them to protect the confidentiality of such data.
 - The Information will be used for the purposes described in clause 2 of this Privacy Policy.
 - Company will not share User personal information with third parties without User permission unless Company's ownership changes or Company merge's or enters into a joint-venture with another party or Company is required to do so under any law or in connection with any legal proceedings and or to defend our legal rights.
 - Company does not knowingly collect personal and sensitive information from persons aged below 18 years.
- Purpose of collecting information

While the specific purposes are covered above, the generic statement of purpose is as mentioned below:

 - To enable Advisor and End Customer to use the Application / Website.
 - To enable the Advisor to withdraw the amount from the bank.

- To facilitate the transactions or report on these transactions.
 - To undertake research and analytics for offering or improving the products/services and their security and service quality;
 - To check and process Advisor's requirements or instructions or requests received from End Customers and/or Advisors in respect of the products.
 - To share with Advisor, updates on changes to the products/services and their terms and conditions including the Application's / Website's terms and conditions.
 - To verify identity and to provide products to the Advisor.
 - To carry credit checks, screenings or due diligence checks as lawfully required by the Company.
 - To undertake financial/regulatory/management reporting and create and maintain various risk management models.
 - To conduct audits and for record-keeping purposes.
 - To comply with the requirements of applicable laws/regulations and/or court orders/regulatory directives.
 - To allow Advisors to sign-up or set-up their account with Company.
 - To initiate legal action in case of breach by Advisor.
 - The Information is collected for Company to understand the kind of Advisor and End Customers accessing Company Application / Website.
 - The Information is collected for Company to understand the Advisor and End Customer behaviour and to customize or modify or enhance its services accordingly.
 - The information is collected for the End Customers to explore and apply for Products listed on the Application / Website.
- In case Advisor wishes to obtain a copy of their personal information or wants to delete or update their personal information or withdraw their consent to publish their Information or if the Advisor has any grievance pertaining to the Company's Application / Website then such person can contact Company's grievance officer **Mr. Sachin Chaurasiya** by sending an email on regarding their request to support@helloaaye.com with the subject line as "**Acceleration of grievance**". Upon satisfactorily ascertaining the credentials of the person seeking the information, Company shall with the Advisor's cooperation, assist them in redressing the grievance or request in a timebound manner. Further, it is clarified that in the event the Advisor withdraws their consent to publish their Information or makes a request of above-mentioned nature in the manner specified above, Company shall at its sole discretion have the rights to disable or restrict or block such Advisor's registration or access to the Application / Website.

- Company may use third-party advertising companies to serve ads when the User visit the Application / Website or Company shall post third-party financial products on the Application / Website. When the Advisor or End-User applies for such products the End-Customer may be redirected to the said third-party webpage or application. These companies and third-parties may use information (including but not limited to) the User's name, address, email address, telephone number, or sensitive personal information) about User's visit to the Application / Website in order to provide advertisements about the products and services of interest to User. Further, such advertisements may have hyperlinks that lead to the advertiser's or third-party's website. COMPANY HEREBY EXPRESSLY CLARIFIES THAT COMPANY IS NOT MAKING ANY WARRANTIES AND SHALL UNDER NO CIRCUMSTANCES BE RESPONSIBLE FOR THE PRIVACY SAFEGUARDS OF SUCH APPLICATIONS OR WEBSITES OR THE ACCURACY OR AUTHENTICITY OF THE DATA CONTAINED IN SUCH WEBSITES OR THE ADVERTISEMENTS, USERS ARE ADVISED TO REFER TO THE PRIVACY POLICIES AND TERMS OF USE OF SUCH WEBSITES AND EXERCISE REASONABLE CAUTION AND DILIGENCE WHEN USING SUCH THIRD PARTY WEBSITES.
- IT IS HEREBY CLARIFIED THAT THE ACCEPTANCE TO THIS PRIVACY POLICY AND THE TERMS OF USE IS A PRECONDITION FOR THE USER TO VISIT OR USE THE APPLICATION / WEBSITE. IN THE EVENT, THE USER DISAGREES TO PROVIDE SUCH ACCEPTANCE THEN SUCH USER IS REQUIRED TO LEAVE/STOP VISITING OR USING THE APPLICATION / WEBSITE IMMEDIATELY. THE USER'S ACT OF USING OR VISITING THE APPLICATION / WEBSITE SHALL BE DEEMED AS ACCEPTANCE BY THE USER TO THE PRIVACY POLICY AND TERMS OF USE.
- Company reserves the right to update or modify all or any part of this Privacy Policy and such update or modification shall (unless specified otherwise) be effective from the date the same is published on the Application However, Users are encouraged and advised to visit the Privacy Policy section from time to time to ascertain if any update or modification has been made to the same.
- While Company has taken appropriate steps for the security and protection of Application / Website, however, Company shall not be responsible for any breach of security or the disclosure of personal data for reasons outside its control, such as hacking, social engineering, cyber terrorism, espionage by third parties, or any events by way of force majeure such as sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war or acts of government.