

Privacy Policy

This privacy policy ("Policy") explains our policy regarding the collection, use, disclosure and transfer of your information by us Private Limited or any of its affiliate(s) ("we" or "us" or "our"), which operates the website ("Site"), " App" (the "App") available on Google Play Store, iOS and other similar platforms and other services including but not limited to recording credit/payment, communicating dues/balances via the site and application, any mobile or internet connected device or otherwise (collectively the " App Service"). This Policy forms part and parcel of the Terms of Use for the App Services. Capitalized terms which have been used here but are undefined shall have the same meaning as attributed to them in the Terms of Use. Users (as defined hereinafter) are requested to read this Policy in conjunction with the Terms of Use.

TThe App/Site (i) provides an online ledger book / record book wherein the Users, can record their ledger entries with their respective customers and (ii) also allows Users to generate a payment link which can be sent to their respective customers and the customers could use the payment link and make the payment of the amount to the Users in settlement of their obligations towards the Users (collectively, "Services"). Please note that 'Services' would include any other future services we may provide or propose to provide.

As we update, improve and expand the App Service, this Policy may change, so please refer back to it periodically. By accessing the Site, App or otherwise using the Digi Khata App Services, you consent to the collection, storage, and use of the personal information you provide (including any changes thereto as provided by you) for any of the services that we offer.

1. When this Policy applies:

1. This Policy applies when you use or subscribe to Data's products, services, applications, websites or networks to which this Policy is linked. This includes data, video, advertising, internet and other products, services and applications. This Policy also applies to other websites owned or operated by.
2. This Policy also applies to you and anyone who uses our products or services under your account, except where we identify that a separate privacy policy or terms and conditions apply. You are responsible for making sure you understand this Policy.

3. You must agree to and be willing to accept the terms of this Policy before you may visit or use any Platform, or any products or services offered therein.
4. This Policy and any additional terms of use apply to you even if you are not our customer and you interact with us as part of running our business, such as by:
 - a. Accessing any of our products or services accessible through any Platform;
 - b. When using any of our products or services;
 - c. When entering any promotion;
 - d. When calling our help desk;
 - e. Generally enquiring about our services or products.
5. If you need to give us personal information about someone else in relation to our products and services, this Policy will also apply.
6. Depending on the product or services, you may also receive service-specific and/or region-specific terms. You will be legally bound by both this Policy and the service/region specific term to the extent that you have accepted them when signing up to any service or product; therefore, you are required to read these terms carefully.

2. Information We collect:

1. Information supplied by users
 - a. Personal information: To avail certain Services on the Digi Khata App, Users are required to provide certain personal information for the registration process which may include:
 - a) their name, b) email address, c) phone number, d) business entity information, (e) account number of the Users, (f) KYC details and any other such information as

required. The Information as supplied by the Users enables us to provide the Services and improve the Digi Khata App Services and provide you the most user-friendly experience. In some cases / provision of certain service(s) or utility(ies), we may require your contact address as well. We may also use your email address, IP Address, Location and phone number without further consent for marketing, non-marketing or administrative purposes (such as notifying you of major changes, for customer service purposes, providing information about updates to Digi Khata App Services, billing, etc.).

- b. Contact list: Upon downloading the App, Users are requested to share access to their contact list (as stored on their mobile device on which the App is downloaded).
- c. Images: In order to enhance the User experience of the Digi Khata App, Users may be requested to upload certain images. Such images, at sole discretion, might be .
- d. Inventory of apps: We may access a user's inventory of installed apps and treat this data as personal or sensitive data subject to this Policy, secure transmission, and prominent disclosure requirements of User.

2. Information gathered while using the App or Site

- a. Credit/Payment Records: We store all your credit/payment records in a cloud-based environment using the services of third party infrastructure service providers.
- b. Customer Information: We store the contact information of your customers. We also keep a log of all the credit/payment related communication to the customers.
- c. Demographic and Related Information: We may reference other sources of demographic and other information in order to provide you with more targeted communications and promotions.
- d. Log File Information: Our Servers automatically collect limited Information about your device's connection to the internet, including your IP address, when you visit our Site or use the App. We automatically receive and log Information from the App and/or your browser including but not limited to IP address, your device or computer's name, and your operating system, We may also collect log Information from your device, including but not limited to your location, IP address, your device's name, device's serial number or unique identification number (e.g. UDID on your iOS device, Android ID or ADID on your Android Device), your device operating system, browser type and version, CPU speed, and connection speed etc.

- e. Cookies: To improve the responsiveness of the Site for our Users, we may use "cookies", or similar electronic tools to collect information to assign each visitor a unique, random number as a User Identification (User ID) to understand the User's individual interests using the identified computer. By continuing to visit the App/Site, you are agreeing to the use of cookies and similar technologies for the purposes we describe in this Policy. If you prefer not to receive cookies or web beacons, then you should stop using Services, or consult your browsing and third-party cookie settings. We use cookies and other technologies for analyzing and optimizing our websites as well as for marketing purposes. Our partners may also assign their own cookies to your browser, a process that we do not control.

3. Information Processes:

1. Accessing and updating personal information: When Users use the Site (or any of its sub sites) / App, we make good faith efforts to provide Users, as and when requested by Users, with access to their Information and shall further ensure that any personal information or sensitive personal data or other Information found to be inaccurate or deficient shall be corrected or amended as feasible, subject to any requirement for such personal Information or sensitive personal data or Information to be retained by law or for legitimate business purposes. We ask individual Users to identify themselves and the Information requested to be accessed, corrected or removed before

processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning Information residing on backup tapes), or for which access is not otherwise required. In any case, where we provide Information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Because of the way we maintain certain services, after you delete your Information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

2. Information sharing:

- a. The Information (including personal information) collected may be shared with our affiliates, and group companies to the extent required for our internal business and/or administrative purposes and/or general corporate operations and to any third-party service providers including marketing partners, and the User hereby consents to the same. We will take reasonable steps to ensure that these third-party service providers are obligated to protect your personal information and are also subject to appropriate confidentiality/non-disclosure obligations and they comply with the applicable provisions of the data protection laws. These entities, with whom we share the Information, may market to you as a result of such sharing unless you explicitly opt-out.

- b. The User explicitly consents that we may have access to your SMS, contacts in your directory, location and device information and we may request you to provide your CNIC and Know-Your-Customer (KYC) details to check your eligibility for certain products/services including but not limited to credit and payment products, etc., to enhance your experience and provide you access to the services being offered by us, our affiliates or other third-party service providers (including lenders).
- c. The User also consents to sharing of Information (including sensitive personal information) when it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing the Terms of Use or for complying with the applicable laws and regulations. No personal information of an individual User such as name, phone number, email address, spends data, card details etc. would be shared with any other User and/or third party unless explicitly approved by the concerned individual User himself/herself.

d. By using the Digi Khata App Services and providing information to us, Users agree and consent to the disclosure, transfer, storage, and processing of the personal information (including the sensitive personal information) by us in Pakistan and / or in other countries to its affiliates, group companies and third parties. While our primary motive is to protect the disclosure of personal information (except in accordance with the provisions of this Policy) of Users, Users may note that countries where their Information may be stored, may not have data protection laws similar to the countries where they are located.

3. Information storage and backup:

a. From time to time, we take backup of your data on Digi Khata App on our cloud database. This is done for the purpose of enabling Users to get their data back in case their phone's data becomes unusable, or phone gets lost, or the User moves to a new phone device. We also use this backup to provide useful insights and information related to their spends such as weekly spends in a month, insights related to spend behavior, etc., and to provide information related to User spends, patterns and User data in the form of aggregated and anonymized statistics on data such as User spends by category, date, time, bank balances, etc.

- b. We shall keep User's Information in our records till the period of time where we can potentially offer the Digi Khata App Services to the Users. After such a period of time where Digi Khata App Services are no longer relevant to a User, we remove all the Information pertaining to a particular User from our records.

4. Information Security:

- a. We take appropriate security measures to protect against unauthorized access to or alteration, disclosure or destruction of data including accidental or intentional manipulation, loss from access by unauthorized parties. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data. All Information gathered on the Digi Khata App is securely stored within the controlled database. Access to the servers is password-protected and is strictly limited.
- b. Our security measures are regularly reviewed and updated to reflect technological developments. Regardless of where your personal information is transferred or stored, we take all steps reasonably necessary to ensure that personal information is kept secure, however, please understand that

no transmission of data over the internet or any other public network can be guaranteed to be 100% (one hundred percent) secure.

- c. We seek to ensure compliance with the requirements of the applicable data protection laws to ensure the protection and preservation of the User's privacy and personal Information. We have physical, electronic, and procedural safeguards that comply with the laws prevalent in specific jurisdiction to protect User's Personal Information. By accepting the terms of this Policy, you agree that the standards and practices being implemented by us, are reasonable and sufficient for the protection of your personal information.
- d. We will contact you regarding any breach of the security, confidentiality, or integrity of your unencrypted electronically stored Personal Information to you via email or any other feasible manner in the most expedient time possible and without unreasonable delay, insofar as consistent with the legitimate needs of law enforcement and will undertake all measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

- 5. Link to third party sites/ad-servers: The Site may include links to other websites such as advertisers, blogs, content sponsorships,

vendor services, social networks, etc. Such websites are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the site you are visiting and we make no representation or warranty on how your information is stored or used on third-party servers. That policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from the website's homepage, you should contact the website directly for more information.

4. Why We collect data:

1. We will only collect and process Personal Information about you where we have a lawful basis to do so. Our primary purpose in collecting your information, including Personal Information from you is to deliver the personalized and its various features. Please note that should you choose to not provide us consent to collect your information, including Personal Information, we may not be able to perform the contract with you. Where we refer to 'perform the contract' we mean the Terms of Use applicable to your use of the Service, which means that you may either not be able to access certain features of the Service or we may not be able to provide you the Service in entirety.
2. We will use your Personal Information with your explicit consent as follows:
 - a. When you agree to share your precise location based on GPS data, we will combine this information with other information that you provide to us on the Service to provide personalized content and advertisements with better accuracy basis your geographic location e.g. you may see more regional content recommendations or

advertisements for local establishments, when you share your precise location based on GPS data;

b. When you agree to share information pertaining to the applications frequently used by you on your device, we will combine this information with other information that you provide to us on the Service, to display advertisements that are more relevant to your interest areas.

3. Whenever the law requires us to get your permission or where we have stated we may seek your permission in this Privacy Notice. In some contexts, we use your Personal Information where we have a legal obligation to do so or to protect your vital interests or those of another person such as:

- a. Prevent, detect and investigate potentially prohibited or illegal activities, including fraud, and enforcing our terms (such as determining free trial eligibility);
- b. Confirming your identity if you are exercising legal rights;
- c. Notify you about changes in the Terms of Use or in this Privacy Notice;
- d. Carry out our obligations and enforce our rights arising from any contracts entered into between you and us/our distributor.

5. Revocation of consent:

6.A User can revoke his consent to the processing of his personal information at any time with effect for the future. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal information where such collection, use and disclosure without consent is permitted or required under applicable laws.

7. Updates/Changes:

1. We may alter our Policy from time to time to incorporate necessary changes in technology, applicable law or any other variant. In any case, we reserve the right to change (at any point of time) the terms of this Policy or the Terms of Use. Any changes we make will be effective immediately on notice, which we may give by posting the new policy on the Site. Your use of the Digi Khata App Services after such notice will be deemed acceptance of such changes. We may also make reasonable efforts to inform you via electronic mail. In any case, you are advised to review this Policy periodically on the Site to ensure that you are aware of the latest version.

8.Responsible organization for the data collection:

1. All the App Services are currently provided and regulated by (Private) Limited and therefore Digi Khata (Private) Limited is responsible for the collection, storage and processing of personal information of the Users.

2. All the App Services are currently provided and regulated by Digi Khata (Private) Limited and therefore Digi Khata (Private) Limited is responsible for the collection, storage and processing of personal information of the Users, except the information being collected by our third-party service providers after obtaining express consent from the Individual Users who shall provide such data either directly to us to be forwarded to our third party service providers, or directly to such third party service providers.

9. Questions/Grievance Redressal:

- 1.

10. Disclaimer:

1. In case any personal information is shared by you with us, which is not requested by us during registration, (whether mandatorily or optionally), we will not be liable for any information security breach or disclosure in relation to such information. If you have any questions regarding this Policy or the protection of your personal information, please contact our data protection officer/grievance officer.

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