

# Privacy Policy

Netwin Systems & Software (I) Pvt. Ltd. Nashik builds the Pigmy Mobile Collection and Mobile banking apps for their customers at no cost. This SERVICE is provided by Netwin Systems & Software (I) Pvt Ltd. Nashik at no cost and is intended to be used by the customers of Netwin Systems & Software (I) Pvt. Ltd.

This page informs website visitors regarding our policies with the collections, use, and disclosure of Personal Information if anyone decided to use the Service.

If you choose to use our Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that we collect is used for providing and improving better Services. We will not use or share your information with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at the pigmy collection app unless otherwise defined in this Privacy Policy.

For a better experience, while using our Service, we may require you to provide us with certain personally identifiable information, including but not limited to <uses-permission android:name="android.permission.CAMERA" />, <uses-permission android:name="android.permission.READ\_PHONE\_STATE" /> . The information that we request will be retained by us and is used as described in this privacy policy.

## Information Collection –

**We may collect your Personal Information when you use our services or Platform or otherwise interact with us during the course of our relationship. We collect Personal Information which is relevant and absolutely necessary for providing the services requested by you and to continually improve the Mobile Banking Platform.**

**Personal and Sensitive Information collected includes but not limited to:**

- Name, age, gender, photo, address, phone number, e-mail id, your contacts and nominee details
- PAN card number, KYC related information such as Pan card no, videos, your business-related information or other online/ offline verification documents as mandated by relevant regulatory authorities,
- Aadhaar information including Aadhaar number or Virtual ID for the purposes of e-KYC authentication with the Unique Identification Authority of India (UIDAI). Note that submission of Aadhaar information is not mandatory for e-KYC authentication, you can also use other types of information, such as your PAN or GST number
- OTP sent to you by bank
- Service or transaction related communication, part of your card details for smooth transaction using Mobile Banking or any of the services
- Your device details such as device identifier, internet bandwidth, mobile device model, browser plug-ins, and cookies or similar technologies that may identify your browser Application and plug-ins, and time spent, IP address and location

Information may be collected at various stages of your usage of the Mobile Banking Platform such as:

- Registering on Mobile Application Platform as an “user” or any other relationship that may be governed by terms and conditions listed on our Platform
- Transacting or attempting to transact
- Accessing links, e-mails, chat conversations, feedbacks, notifications sent or owned by Mobile Banking Platform

We and our service providers may also collect your Personal Information from third parties or information made publicly available including but not limited to:

- Financial history and other information for the purpose of verifying and authenticating an investment transaction request you place with us to prevent suspicious transactions, or to comply with court judgements and bankruptcies, from credit reference and fraud prevention agencies.
- Your demographic and photo information including but not limited to Aadhaar number, address, gender, and date of birth as a response received from UIDAI upon successful Aadhaar e-KYC
- The Contact List we collect from the “User” are only for the Recharge Purpose and we don’t save or share any Contact List related Details on our Platform or our service providers.

## **Purpose and Use of Information**

### **In App Permissions / Prominent Disclosure**

#### **Camera permission:**

In order to use the Scan and Pay feature, we require access to your device's camera. This permission allows us to scan QR codes and barcodes to quickly and easily process payments. We understand the importance of your privacy and assure you that we will not access your camera for any other purpose than the intended function

#### **Location permission:**

For easy loan recovery, we request access to your home location latitude and longitude. This permission allows us to locate you in case of any unforeseen circumstances where loan recovery is necessary. We take your privacy seriously and assure you that we will not access your location data for any other purpose than the intended function.

#### **storage permission:**

This app needs access to your device's storage to download your bank statement and scan QR codes that you have already downloaded to your device for the scan and pay fund transfer feature. We will not collect or share any of your personal or sensitive data without your consent. You can revoke consent at any time in the app's settings.

#### **Record audio permission:**

To provide you with a voice command assistant, we require access to your device's microphone. This permission allows us to process your voice commands accurately and efficiently for searching & executing commands related to the app. We understand the importance of your privacy and assure you that we will not access your microphone for any other purpose than the intended function.

#### **Bluetooth permission:**

Our app uses the Bluetooth permission to connect to a printer and print collection receipts. This is a necessary function for your convenience. We take your privacy seriously, and we will not access your Bluetooth for any other purpose.

#### **Read,collect and use of Contact List:**

**This app collects, transmits, syncs, and stores the contact list to enable the Mobile Recharge Functionality, enhancing your experience and making it easier to recharge your friends and family members' phones.**

## **Why We Need Access to Your Contact List**

Our app requests access to your contact list to enhance your experience and make recharging your friends and family members phones easier. We take your privacy seriously and want to be completely transparent about how we use this information.

### **How We Use Your Contact List:**

1. **Identify Users:** We use your contact list to facilitate seamless recharging from your phone using the contact information of your friends and family members, making it a convenient process.
2. **Secure Recharging:** We've streamlined the recharging and bill payment process using a secure REST API. Only the necessary recharge numbers are uploaded for processing, ensuring your privacy. Your data is encrypted, and stringent security measures are in place to protect it.

### **Your Trust is Our Priority:**

We prioritize safeguarding your information for a seamless experience. You can learn more about how we collect and use your data in our comprehensive privacy policy. You have the choice to either accept or reject this permission; it's entirely up to you.

## **Mobile Number Usage**

The app collects users' mobile numbers for the following purposes:

1. Registering an account.
2. Resetting a password if the user forgets it.
3. Resetting an MPIN if the user forgets it.
4. Resetting a UserID if the user forgets it.
5. Processing offline registrations.

We will not share users' contact lists or mobile numbers with anyone else, and we will take all necessary steps to protect users' privacy.

## **We may process your Personal Information for the following purposes:**

- Creation of your account and verification of your identity and access privileges
- Provide you access to the products and services being offered by us.
- To conduct the KYC compliance process as a mandatory prerequisite as per the requirements of various regulatory bodies, including UIDAI under the Aadhaar Act and its Regulations

- To validate, process and/or share your KYC information, nominee details with other intermediaries, Regulated Entities (REs) or AMCs or financial institutions or with any other service providers as may be required
- To process payments on your behalf and on your instructions; communicate with you for your queries, transactions, and/or any other regulatory requirement, etc.
- To authenticate a transaction request; validate a standing instruction for a Systematic Investment Plan or confirm a payment made via the services
- To inform you about online and offline offers, products, services, and updates; customizing and improving your experience.
- To resolve disputes; troubleshoot problems; technical support and fixing bugs; help promote a safe service
- To identify security breaches and attacks; investigating, preventing, and taking action on illegal or suspected fraud or money laundering activities and conducting forensic audits as part of internal or external audit or investigation by us or government agencies located within India or outside the Indian jurisdiction
- To meet legal obligations

While we may also process your Personal Information for other legitimate business cases, we ensure to take appropriate steps to minimize the processing to the extent possible, making it less intrusive to your privacy.

### **Information Sharing and Disclosures ----**

Your Personal Information is shared as allowed under applicable laws, after following due diligence and in line with the purposes set out in this Policy. We may share your Personal Information in the course of your transaction with different categories of recipients such as merchants, affiliates, associates, legally recognized authorities, regulatory bodies, governmental authorities, financial institutions, internal teams such as marketing, security, investigation team, etc.

Personal Information will be shared, as applicable, on need-to-know basis, for the following purposes:

- For enabling the provision of the products/services availed by you and facilitating the services between you and the service provider, as requested
- For the Aadhaar authentication process by submitting Aadhaar information to Central Identities Data Repository (CIDR) and National Securities Depository Limited (NSDL)

- For complying with applicable laws as well as meeting the Know Your Customer (KYC) requirements as mandated by various regulatory bodies, whose regulated service/product you opt through our services/Platforms
- For completing a payment transaction initiated by you on a merchant site, where based on your instructions, the merchant requests to fetch your Personal Information from us
- For the purpose of processing your financial product subscription requests placed with us and ensuring that these requests reach the relevant financial institution whose service/product you have opted for
- If it is required by financial institutions to verify, mitigate, or prevent fraud or to manage risk or recover funds in accordance with applicable laws/regulations
- For services related to communication, marketing, data and information storage, transmission, security, analytics, fraud detection, risk assessment and research
- Enforce our Terms or Privacy Policy; respond to claims that an advertisement, posting, or other content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public
- If required to do so by law or in good faith we believe that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process
- If requested by government authorities for government initiatives and benefits
- For grievance redressal and resolution of disputes
- With the internal investigation department within us or agencies appointed by us for investigation purposes located within or outside the Indian jurisdiction

While the information is shared with third parties as per purposes set out in this Policy, processing of your Personal Information is governed by their policies. We ensure stricter or no less stringent privacy protection obligations are cast on these third-parties, wherever applicable and to the extent possible. However, we may share Personal Information with third-parties such as legally recognized authorities, regulatory bodies, governmental authorities, and financial institutions as per purposes set out in this Policy or as per applicable laws. We do not accept any responsibility or liability for usage of your Personal Information by these third parties or their policies.

## **Reasonable Security Practices----**

**Netwin Systems & Software (I) Pvt. Ltd is an certified entity and has deployed technical and physical security measures to safeguard user's Personal Information and Sensitive Personal Information. Specifically, in**

**order to safeguard your Aadhaar information, we have implemented applicable security controls as given under and required by the Aadhaar Regulations. We understand that as effective as our security measures are, no security system is impenetrable. Hence, as part of our reasonable security practices, we undergo strict internal and external reviews to ensure appropriate information security encryption or controls are placed for both data in motion and data at rest within our network and servers respectively. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited.**

Further, you are responsible for maintaining the confidentiality and security of your login id and password. Please do not share your login, password, and OTP details with anybody. It shall be your responsibility to intimate us in case of any actual or suspected compromise to your Personal Information.

We have provided multiple levels of security to safeguard the Application by login/logout option. We have preventive controls implemented to ensure you use our Application on your device and the same login credentials cannot be used on different device without any additional authentication/OTP.

### **Log Data**

We want to inform you that whenever you use our Service, in a case of an error in the app we collect related data and information (through third party products) on your phone called Log Data. This Log Data may include but not limited to information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics related to the error.

### **Cookies**

Cookies are files with a small amount of data that are commonly used as an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your device's internal memory.

This Service does not use these "cookies" explicitly. However, the app may use third-party code and libraries that use "cookies" to collect information and to improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of the related Service.

## **Service Providers**

We may employ third-party companies and individuals due to the following reasons:

To facilitate our Service;

To provide the Service on our behalf;

To perform day to day operations related services; or

To assist us in analyzing how our Service is being used.

We want to inform users of this Service that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

## **Security**

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

## **Links to Other Sites**

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **Children's Privacy**

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do the necessary actions.



### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

### **Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us.

This privacy policy page was created by [netwin.in](http://netwin.in)