

PRIVACY POLICY

Introduction

Welcome to <https://www.ibdic.in/> ("Website") and [mobile application for android and iOS operating systems] ("Application"), offering various specialized services in utilizing advance technologies to provide digital infrastructure and deliver financial solutions to its customers ("Services") including banking companies, fintech companies, credit information companies and any other corporations and/or organizations accessed through the web and the mobile applications (Website and Mobile App are hereinafter collectively referred to as "Platform") owned and managed by IBDIC Private Limited (formerly known as IBBIC Private Limited) and its affiliates ("Company").

Your visit and use of the Platform for accessing and managing the financial product in relation to the Services are subject to this privacy, security and cookies policy herein ("Privacy Policy") and other terms and conditions of the Platform.

This Privacy Policy ensures our firm commitment to your privacy vis-à-vis the protection of your information.

In this Privacy Policy "we", "our" and "us" refers to the Company and "you", "your" and/or "Users" refers to the users of the Platform.

In the event wherein the User is an individual person, you must be 18 years of age or older to visit or use the Website and/or Application in any manner. If you are under the age of 18 years, you should review this Privacy Policy with your parent or legal guardian to make sure that you and your parent or legal guardian understands and agrees to it and further, if required, you shall perform or undertake such activities which will entitle you to enter into a legally binding agreement with the Company.

By visiting this Website and/or Application or accepting this Privacy Policy, you represent and warrant to the Company that you are 18 years of age or older, and that you have the right, authority and capacity to use the Website and/or Application and agree to and abide by this Privacy Policy. You also represent and warrant to the Company that you will use this Privacy Policy in a manner consistent with any and all applicable laws and regulations.

In addition to the considerations stipulated under this Privacy Policy your activities undertaken on the Website and/or the Platform shall also be governed by the terms and conditions of the Website, service level agreements, membership cum services agreement signed by the respective parties with Company and any other terms and conditions as published by the Company from time to time.

This document is published and shall be construed in accordance with the provisions of the Digital Personal Data Protection Act, 2023 ("DPDP Act") and the Digital Personal Data Protection Rules, 2025 ("DPDP Rules"), alongside the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 ("Intermediary Rules") that require publishing the rules and regulations, Privacy Policy, and Terms of Use for access or usage of the Platform.

Under the statutory framework of the Digital Personal Data Protection Act, 2023, The Company primarily operates as a Data Processor; however, it may act as a Data Fiduciary to the extent it independently determines the purpose and means of processing Personal Data.

The DPDP Act abolishes the distinction between "Personal Information" and "Sensitive Personal Information." Therefore, all identifiable digital information collected and processed through the Platform shall collectively be referred to as "Information" or "Personal Data" in this Policy.

This Privacy Policy is an electronic record in the form of an electronic contract formed under the Information Technology Act, 2000, rules made thereunder, and the DPDP Act 2023, as amended from time to time. This Privacy Policy does not require any physical, electronic or digital signature.

Please read this Privacy Policy carefully. By using the Platform, you indicate, agree and acknowledge that you understand, agree and acknowledge this Privacy Policy and the processing of information in accordance with it.

By using this Website or by giving us your Information, you accept the practices described in this Privacy Policy. Where the Company acts as a Data Processor, you acknowledge that your consent for processing of Personal Data is obtained by the relevant Data Fiduciary (such as your bank, lender, or partner institution), prior to such data being transmitted to the Platform. Where the Company acts as a Data Fiduciary, such consent shall be obtained directly by the Company in accordance with applicable law. Where the Company acts as a Data Fiduciary, it shall obtain consent in accordance with applicable law.

If you do not agree to this Privacy Policy, please do not use this website or give us any Personal Data.

We reserve the right to change this Privacy Policy without prior notice due to changes in applicable laws, promulgation of new statutes/laws/regulations or basis directions issued by competent statutory/regulatory authorities. For ensuring that you are updated on the Privacy Policy terms, we encourage you to regularly review this Privacy Policy to ensure that you are aware of any changes and how your personal data may be used.

Our Privacy Policy governs your use of the Services on the Platform, and explains how we collect, safeguard and disclose information that results from your use of the Services. We reserve the right to amend and supplement to complete this Privacy Policy at any time. Whenever there is a change to our Privacy Policy, we post updates on our Website and/or Application. We encourage you to regularly review this Privacy Policy to get the latest updates.

Our Terms and Conditions ("Terms") govern all use of our Services and together with the Privacy Policy constitutes your agreement with us ("Agreement").

Definitions

Unless otherwise defined elsewhere in this Privacy Policy, the following terms shall have the meanings assigned to them as herein below for the purposes of this Privacy Policy:

- **"USAGE DATA"** means information and data collected and captured as a result of the use

of Service.

- **“COOKIES”** mean small data files stored on your device (computer or mobile device).

Information Collection and Use

Collection of Data

In order to avail the Services on the Platform, account registration by the User is mandatory. You are required to provide various Personal Information at the time of registration. You are fully responsible for all activities that occur under your account. You specifically agree that the Company shall not be responsible for unauthorized access to or alteration of your transmissions or data, any material or data sent or received or not sent or received through the Platform.

By registering, you acknowledge the processing of your Personal Data as instructed by your Data Fiduciary. The Company respects the privacy of the Users of the Services and is committed to reasonably protect it in all respects.

The information about the Users processed by the Company on behalf of Data Fiduciaries are:

1. Information supplied by Users or their respective Data Fiduciaries;
2. Information automatically tracked while navigation;
3. Inferred information through usage and log data;
4. Information collected in pursuance of performing our operations and/or Services;
5. Information collected from any other sources (like third party providers or partner banks);

In order to provide Services and to maintain and improve the Platform, certain information (including Personal Data) will be processed when you express an interest in obtaining information about us or our products and Services and/or when you participate in activities on our Platform. Such Personal Data may be collected in various ways including during the course of your:

1. Registration as a User on the Platform, and/or interacting with our enterprise Services;
2. Availing Services offered on the Platform. Instances of such Services include but are not limited to, communicating with the Company customer service by phone, email or otherwise;
3. Granting permission to share credentials of your online accounts maintained with third parties.

We may receive Personal Information about you from such third parties, including Data Fiduciaries and business partners. If you access the Platform through a connected service on the Platform, the information we collect may include your information available through such connected service. In order to provide Services and to maintain and improve the Platform, we may require you to grant certain access rights to your system.

Types of Data Collected

We collect different types of information, including Personal Data, for various purposes to provide and improve our Services for you.

Personal Data

While using our Services, we or your Data Fiduciary may ask you to provide certain Personal

Data i.e. personally identifiable information that can be used to contact or identify you. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, Country, State, Province, ZIP/Postal/Pin code, City
- Other contact information
- Gender and other demographics
- Date of birth and age
- Location Data
- Cookies and Usage Data

As a Data Processor, we process your Personal Data strictly to fulfill our contractual obligations to the Data Fiduciary. We do not use your Personal Data to contact you with independent newsletters, marketing, or promotional materials unless explicitly instructed by the Data Fiduciary.

Usage Data

We may also collect information that your browser sends whenever you visit our Platform and/or use the Services or when you access the Platform by or through any device ("Usage Data"). This Usage Data may include information such as server log, your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, referring site/webpage, the time and date of your visit, the time spent on those pages, the content that you access on those pages, unique device identifiers and other diagnostic data.

When you access the Platform with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

You undertake that the Personal Data and other Information provided by you is true and accurate to the best of your knowledge. You agree and understand that we shall not be liable for the authenticity of the Personal Data and/or other Information provided by you.

We use the Information collected to manage our business and offer an enhanced online experience. Further, it enables us to:

- Process applications, requests and transactions on behalf of Data Fiduciaries
- Maintain internal records as per regulatory guidelines
- Provide technical support services
- Comply with all applicable laws and regulations
- Recognize the customer when they conduct online transactions

Location Data

We may use and store information about your location if you give permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service.

Tracking Cookies Data

We may use Cookies, web beacons and similar tracking technologies to track the activity on our Platform and we may hold certain information. We may use a web beacon to recognize certain types of information on User's computer such as time and date of page view, users cookie number, page description.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Services.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Platform and/or the Services.

Other Data

We may also process the following information and data as instructed by the Data Fiduciary: registration at place of residence and actual address, details of documents on education, qualification, professional training, employment agreements, non-disclosure agreements, information on bonuses and compensation, information regarding your transactions on the Platform, your financial information such as bank account information or credit card or debit card or other payment instrument details and other data necessary for supply chain and trade finance execution.

Purpose for Collection and Use of Data All required information is Services dependent and the Company processes the above said User Information solely based on the documented instructions of the Data Fiduciary to maintain, protect, and improve the Services.

The Company uses the collected data for various purposes including but not limited to the following:

- To create and maintain an online account with the Platform;
- To maintain our Platform and enable you to avail the Services;
- To process personal contact information, KYC details, financial documents, etc., strictly as required to execute financial transactions on the blockchain network;
- To check and verify the authenticity of the User and for prevention of fraud;
- To provide customer and technical support;
- To detect, prevent and address technical issues;
- To dispatch transaction-related communications;
- To comply with applicable laws, rules, and regulations.

The data processed is solely restricted to the above-mentioned activities and will not be used further for any other independent purpose. In case data is to be used for any other purpose, explicit consent shall be collected by the respective Data Fiduciary.

We will ensure that all data is stored only in servers located within India, while ensuring compliance with statutory obligations and RBI regulatory instructions.

Retention of Data Operating as a Data Processor, we will retain your Personal Data only for as long as instructed by the Data Fiduciary to fulfill the purposes set out in this Privacy Policy, or as mandated by applicable laws.

Upon receiving verified instructions from the Data Fiduciary, or upon termination of the service contract, we will securely erase the Personal Data. However, in strict compliance with Rule 6 and Rule 8 of the DPDP Rules 2025, we are legally obligated to retain system traffic data, Usage Data, and processing logs for a minimum period of one (1) year to strengthen security and facilitate statutory investigations. Immutable cryptographic hashes recorded on the DLT network will be mathematically decoupled from identifiable Personal Data to ensure permanent anonymization.

Withdrawal of Consent as the Company operates as a Data Processor, we do not directly evaluate or execute consent withdrawal requests from Data Principals.

You may withdraw your consent given for processing any Personal Data at any time by contacting your respective **Data Fiduciary** (the bank or institution holding your direct relationship). Upon receiving formal instruction from the Data Fiduciary regarding your consent withdrawal under Section 6 of the DPDP Act, the Company will promptly cease processing your Personal Data and execute erasure protocols within a reasonable timeframe.

Disclosure of Data

We may disclose the information including Personal Data that we process on our Platform as follows:

- **Disclosure for Law Enforcement and other legal necessity:** We reserve the right to use or disclose your Personal Data in response to any statutory or legal requirements, court orders, and other legal processes as mandated by Indian law.
- **Business Transaction:** If we or our group entities are involved in a merger, acquisition or asset sale, we may transfer your information to the new owner, subject to the DPDP Act constraints and Data Fiduciary agreements.
- **Disclosure by the User:** When you use certain features on the Platform and you post or share your Personal Information, the same will be available to all such authorized users.
- **Other Disclosures:** We may also disclose your Personal Data to our subsidiaries, affiliates, contractors, and Sub-Processors we use to support our business, strictly in compliance with the provisions of this Privacy Policy and under valid contractual agreements with the Data Fiduciary.

Data Processing by the Service Providers

We may engage and employ third-party companies and individuals (Sub-Processors) to perform certain processing activities and to perform Services on our behalf. Towards that objective, we may share your Personal Information with such Sub-Processors.

As mandated by the DPDP Act, all Sub-Processors are engaged under valid, legally binding contracts that impose the exact same data protection obligations, confidentiality requirements, and reasonable security safeguards as required by the Data Fiduciary and the DPDP Rules 2025.

Data Security Practice and Procedure

Security of Data

We maintain strong security safeguards to ensure the security and confidentiality of the User's data, protect against any anticipated threats, and ensure the proper disposal of your Personal Information.

In strict adherence to **Rule 6 of the DPDP Rules 2025**, we have adopted a comprehensive security policy that includes the mandatory encryption of personal data at rest and in transit, data masking, tokenization, and strict Role-Based Access Controls (RBAC). Our safeguards are reviewed and adjusted periodically through independent Vulnerability Assessment and Penetration Testing (VAPT) audits.

No data collected and allowed to be stored by us shall be stored in any server which is not located in India, complying unconditionally with RBI data localization mandates.

Standards for handling security breach:

All suspected or reported security breaches or violations shall be logged and tracked from initiation of the preliminary analysis till completion of actions taken. Below mentioned are the steps for handling security breach:

1. Move quickly to secure the systems and fix vulnerabilities.
2. Mobilize the breach response team right away to prevent additional data loss.
3. As a Data Processor, if any security breach comes to our knowledge, we shall notify the affected Data Fiduciary **immediately and without undue delay**.
4. We will provide all necessary forensic and technical assistance to enable the Data Fiduciary to seamlessly fulfill its statutory obligation to notify the Data Protection Board of India (DPB) and the affected Data Principals within the legally mandated 72-hour reporting window.
5. As per the Indian Computer Emergency Response Team ("CERT-In") cyber-security directions, we shall also report cyber incidents within stipulated timelines to incident@cert-in.org.in.

Grievance Officer As a Data Processor, IBDIC does not directly resolve Data Principal rights requests (such as access, correction, or erasure) or primary grievances. Users must direct their

rights requests and grievances to the respective **Data Fiduciary** (e.g., your banking institution), who is statutorily mandated to redress grievances within 90 days under the DPDP Rules 2025.

If IBDIC inadvertently receives a direct request or grievance from a Data Principal, it will be promptly routed to the relevant Data Fiduciary. For regulatory inquiries or questions regarding our processing architecture, the contact details of our Compliance / Grievance Officer are provided below:

The Grievance Officer

Name: Rishabh Garg

Address: Unit 3, 5th floor, Tower E, Times Square, Marol, Andheri (East), Mumbai 400059

Email: rishabh.garg@ibdic.in

Transfer of Data The information, including Personal Data, we obtain from or about you is maintained, processed, and stored by us exclusively on systems situated in the territory of the Republic of India, ensuring strict alignment with RBI payment data localization mandates. We do not transfer your Personal Data to an organisation or a country outside India unless explicitly instructed by the Data Fiduciary and strictly permitted under prevailing Central Government notifications.

When there is no longer a business, legal, or regulatory requirement to keep the data, all copies thereof will be destroyed or securely returned to the Data Fiduciary. Secure cryptographic erasure of digital records and off-chain vaults will be executed to guarantee permanent anonymization.

Links to Other Sites

Our Platform may contain links to third-party websites and mobile applications that are not operated by us. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Changes to this Privacy Policy

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future. We may update our Privacy Policy from time to time to reflect evolutions in our technological infrastructure, shifts in legal jurisprudence, or new regulatory notifications under the DPDP Act. We will notify you of any changes by posting the new Privacy Policy on this page, and we may update the “effective date” at the top of this Privacy Policy. Your continued use of the Platform and our Services after we post any modifications will constitute your acknowledgment of the modifications.

Copyright, Trademark, and other Intellectual Property Protection

All wordmarks and logos of the Company are exclusive intellectual property of the Company. All materials on the Platform are protected by copyright laws, trademark laws, and other intellectual property laws. Any unauthorized use of any such information or materials may violate copyright

laws and regulations.

Beware of Phishing Attempts and Interest Scams

While email is convenient, it can be misused by criminals for scams and "Phishing emails". Fraudulent websites often look identical to a legitimate site, so it's important to look very closely at the website address. Always click on the lock symbol and review the certificate details. If you receive an e-mail that you think could be a scam, contact the helpline numbers of the Website. In the event you become a victim to Phishing Emails due to your own negligence, the Company holds no responsibility and bears no liability.

Disclaimer of liability for User Information Security We take appropriate, commercially acceptable measures and reasonable security safeguards as mandated under Rule 6 of the DPDP Rules 2025 to protect Personal Data. Notwithstanding the aforesaid, despite our efforts to maintain privacy and confidentiality, no method of transmission over the Internet or electronic storage is 100% secure. If any Personal Data is compromised despite our strict adherence to the documented safeguards, you agree that liability shall be determined in accordance with the executed Data Processing Agreements with the respective Data Fiduciary.

Contact Us

If you have any questions about this Privacy Policy, please contact us by email: legal@ibdic.in