

PRIVACY POLICY

1. INTRODUCTION

This **Privacy Policy** provides information on the collection, use, and sharing (collectively referred to ‘**processing**’ or ‘**process**’) as of personal information by GTID Solutions Development Pvt. Ltd. (referred as “ApnaPay”) and its affiliates (“ApnaPay”, “we” or “us”) in connection with your use of ApnaPay websites, POS device, software subscription, mobile applications, and social media pages that link to this Privacy Policy, your interactions with ApnaPay during in-person meetings or at ApnaPay events, and in the context of other offline sales and marketing activities. This Privacy Policy also explains the privacy rights you have in relation to these processing activities.

This Privacy Policy was last updated on March 24, 2020. However, the Privacy Policy can change over time, for example to comply with legal requirements or to meet changing business needs. The most up-to-date version can be found on the [website](#).

As used in this Privacy Policy, ‘personal information’ or ‘personal data’ means information that relates to an identified individual or to an identifiable individual. For example, this could include among other things your name, address, email address, business contact details, geolocation (only if you choose to enable location-based services), Program usage, time stamp, Device and operating system identification, login credentials, or information gathered through your interactions with us via our website, POS device, software subscription, mobile applications or at events.

2. SCOPE

This Privacy Policy applies to the processing of personal information by ApnaPay of:

- visitors and users of the various ApnaPay sites, including our websites on apnapay.in, POS device, software subscription, mobile applications and our social media pages that link to this Privacy Policy (collectively referred to as the **applications**);
- attendees of ApnaPay events and gatherings;
- customers and prospective customers and their representatives;
- subscribers to ApnaPay Blogs; and
- suppliers and business partners and their representatives.

When interacting with our applications, you also have the ability to link or connect with non-ApnaPay websites, services, social networks, applications or other features. Enabling these features will lead to other parties than ApnaPay processing information about you. ApnaPay does not have any control over these features of other parties. We encourage you to review the privacy policies of these parties before using these features.

3. WHY AND HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use personal information for the following business purposes:

- to communicate and respond to your requests and inquiries to ApnaPay;
- to deliver functionality on our applications and for their technical and functional management;
- to engage in transactions with customers, suppliers and business partners and to process orders for ApnaPay products and services;
- to analyse, develop, improve and optimize the use, function and performance of our and our affiliates' products and services;
- to manage the security of our sites, networks and systems; and
- to comply with applicable laws and regulations and to operate our business.

4. WHAT IS OUR BASIS FOR PROCESSING INFORMATION ABOUT YOU?

For personal information collected about you, our basis for processing is the following:

- In order to communicate adequately with you and to respond to your requests, we need to process information about you and therefore have a **legitimate interest** in processing this information.
- In order to engage in transactions with customers, suppliers and business partners, and to process purchases and downloads of our products and services, we need to process information about you **as necessary to enter into or perform a contract** with you.
- We process personal information for marketing and sales activities based on your **consent** where so indicated on our applications at the time your personal information was collected, or further to our **legitimate interest** to market and promote our products and services.
- We rely on our **legitimate interest** to analyze, develop, improve and optimize our and our affiliates' products and services, and to maintain the security of our sites, networks and systems.
- In order **to comply with applicable laws and regulations**, such as to comply with a subpoena or other legal process, or to process an opt-out request.

5. FOR WHAT PERIOD DO WE RETAIN PERSONAL INFORMATION

ApnaPay maintains personal information for the following retention periods:

- Information about you we collect will be retained for the duration of the transaction or services period, or longer as necessary for record retention, legal compliance or any other business purposes.
- On the request of deletion of personal information by you, the personal information is retained for as per applicable laws.

6. WHEN AND HOW CAN WE SHARE YOUR PERSONAL INFORMATION?

You are the owner of your Personal Information and we are the custodians. You grant us and our subsidiaries, affiliates, and successors a worldwide, exclusive, royalty-free, fully-paid, transferable, irrevocable, perpetual, and sub-licensable right to process your Personal Information throughout the world in any media for any reason. You retain all rights in your Content, subject to the rights you granted to us in our [Terms of Service](#).

Information about you may be shared throughout ApnaPay's organization. ApnaPay employees are authorized to access personal information only to the extent necessary to serve the respective purpose(s) and to perform their job functions.

We may share personal information with the following third parties for a business purpose:

- Third-party service providers (for example, credit card processing services, order fulfilment, analytics, event/campaign management, website management, information technology and related infrastructure provision, customer service, e-mail delivery, auditing, and other similar service providers) in order for those service providers to perform business functions on behalf of ApnaPay;
- Relevant third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings);
- As required by law, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes.

When third parties are given access to personal information, we will take appropriate contractual, technical and organizational measures designed to ensure that personal information is processed only to the extent that such processing is necessary, consistent with this Privacy Policy, and in accordance with applicable law.

7. HOW IS YOUR PERSONAL INFORMATION SECURED?

ApnaPay have adopted reasonable security practices and procedures to include strategic, operational, managerial, technical, and physical security controls to safeguard and protect your Personal Information. We have implemented such measures to protect against unauthorized access to and unlawful interception of Personal Information.

Our applications have industry standard security precautions in place to protect the loss, misuse and alteration of information which is in our environment. Whenever you change or access your account information, we facilitate the use of secure systems.

The information in our custody and control is protected by adherence to reasonable security procedures in order to safeguard against unauthorized access. We apply encryption or other appropriate security controls to protect Personal Information when stored or transmitted by us.

8. HOW TO ACCESS, CORRECT AND DELETE YOUR PERSONAL INFORMATION?

- You shall be responsible to ensure that the information or data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consent to provide such information or data.
- Based on technical feasibility, we will provide you with the access to all your personal and sensitive personal information that we maintain about you. We will perform verification before providing you access to this information.
- You may note that deletion of certain information or withdrawal of consent may lead to cancellation of your registration with us or your access to our services.
- Additionally, we may not be able to process your request of correction, updation or deletion, in case the same is not supported by valid documents or data retention if required by the applicable law or law enforcement requests or under any judicial proceedings or it is extremely difficult to implement (such as requests related to backup copies or if a new system is required to process the request or change of technical design) or risks the privacy of other users.

You can exercise these choices in accordance with applicable laws as specified on by writing us at privacy@apnapay.in

9. DATA PROTECTION

If you believe your personal information has been used in a way that is not consistent with the Privacy Policy or your choices, or if you have further questions, comments or suggestions related to this Privacy Policy, please write us at privacy@apnapay.in

Written inquiries may be addressed to:
GTID Solutions Development Pvt. Ltd.
G-46, Sector-03
Noida-201301
India

10. DISPUTE RESOLUTION OR FILING A COMPLAINT

If you have any complaints regarding our compliance with this Privacy Policy, please write us at privacy@apnapay.in. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with this Privacy Policy and in accordance with applicable law.