



## Privacy Policy

Applicable for Customers using Dhani Pay Prepaid Account and Dhani Pay Card issued by TranServ Ltd.

*It is also applicable to customers using Udio Wallet and Udio Card issued by TranServ Limited. Please note that TranServ was issuing prepaid instruments under the name 'Udio' and has now renamed its products & services under the brand 'Dhani Pay' with effect from 10<sup>th</sup> April, 2019. Customers registered for Udio Wallet, Udio Card and / or Udio Services will be governed by the following privacy policy applicable for Dhani Pay Prepaid Account, Dhani Pay Card and/or Dhani Pay Services respectively.*

**Please review this privacy policy carefully before accessing / using the mobile app/site)**

**Last Updated December 2023**

TranServ Limited ("**TranServ**") is committed to respecting and safeguarding the privacy of all its service recipients and users of its mobile app/website (hereinafter referred to as the "Platform"). This privacy policy ("**Policy**") discloses the practices and policies adopted by TranServ for collecting, storing, retrieving, or using personal data and sensitive personal data or information it may receive from its users of the Platform. This Privacy Policy applies regardless of whether the Platform is accessed by use of a computer, mobile phone, tablet or any other media or computer resource. The Terms and Conditions of Use of the Platform are incorporated in this Policy by reference.

This Policy

- (i) is an electronic record under the Information Technology Act, 2000 read with rules and regulations made thereunder and is generated by a computer system; and
- (ii) will not require any physical, electronic, or digital signature.

The Policy is published in accordance with the

- i) The Digital Personal Data Protection Act, 2023;
- ii) The Information Technology Act, 2000, as amended;

- iii) Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, as amended ("SPI Rules");
- iv) the Information Technology (Intermediaries Guidelines) Rules, 2011, as amended.

This Policy is applicable to all personal and sensitive personal data or information that is disclosed by or obtained from any person who visits or uses or accesses the Platform ("User").

TranServ reserves the right to change or modify or review or update the provisions of this Policy without prior notice. Therefore, Users are requested to periodically visit the Platform and review the Policy. Any such changes or updates etc. will be effective immediately upon posting the same on the Platform.

## **1. Definitions**

"Applicable Law" means all applicable statutes, acts of Indian legislature, ordinances, rules, bye-laws, regulations, notifications, circulars, guidelines, policies, directions, directives and orders of any government, statutory authority, regulatory authority, tribunal, board or court in India;

"General Information" shall have the same meaning ascribed to it in clause 2.5 of the Policy.

"Personal Information" shall mean information disclosed by or obtained from any User and includes without limitation name, age, occupation, marital status, email, residential address, telephone number, SMS messages, payment processing details, and any other personal details capable of identifying such a person.

"Sensitive Personal Information" shall, excluding any information that is freely available or accessible in the public domain or is furnished under Applicable Laws, mean the following information:

- a. Password;
- b. SMS messages
- c. Contact details
- d. sexual orientation; and
- e. financial information such as bank account or credit/debit card details or other payment instruction details.

"**User**" means any person who visits or uses the Platform or has an account at the Platform.

## 2. Collection of Information

2.1. A User may be required to reveal Personal Information or Sensitive Personal Information for the purposes of (a) browsing through the Platform; (b) opening an account/registering at the Platform; (c) applying to purchase products/avail services at the Platform; or (d) purchasing products/ availing services at the Platform.

2.2. Prior to furnishing Personal Information/ Sensitive Personal Information to TranServ for any one or more of the purposes described above, a User must grant consent to TranServ for using the Personal Information. The Personal Information/Sensitive Personal Information will be used only for the purposes set out in Clause 3 of the Policy. If the User does not wish to provide such Personal Information/ Sensitive Personal Information, the User must not proceed with using the Platform.

2.3. TranServ will collect Personal Information/ Sensitive Personal Information only for a lawful purpose connected with a function or activity of TranServ, for which activity the Personal Information/ Sensitive Personal Information is reasonably considered necessary.

2.4. TranServ will not be responsible for the validity, accuracy, correctness or completeness of the Personal Information/ Sensitive Personal Information provided by the User, or any consequences arising in relation to the invalidity, inaccuracy, incorrectness or incompleteness of the Personal Information/ Sensitive Personal Information. The User must update the Personal Information/ Sensitive Personal Information to ensure that such information is valid, accurate, correct and complete.

2.5. While browsing through the Platform, the Platform server may automatically record some general information about User's visit, such as the date and time of visiting the Platform, the IP address being used, GPS/Cell tower location, the type of browser being used, browser language etc. ("**General Information**"). Such General Information collected is not Personal Information/ Sensitive Personal Information for the purpose of this Policy.

2.6. TranServ reserves the right to use General Information collected by it for any purpose whatsoever including statistical analysis, tracking overall traffic patterns and marketing and promotional purposes. Consequently, TranServ may share such General Information or any analysis with any third party, at its discretion.

2.7. TranServ may have obtained with your consent certain additional information, from your mobile device like device location, device information (including storage, model, installed apps, wifi, mobile network) transactional and promotional SMS (originating from

Alphanumeric senders), communication information including contacts and call logs, for statistical modeling, credit scoring and any other purpose that will help us in providing you with optimal and high quality service.

### **3. Use of Personal Information and Sensitive personal Information**

Personal Information/ Sensitive Personal Information disclosed to TranServ by a User will be used by TranServ for one or more of the following purposes:

- a. to verify the User's identity
- b. to maintain, protect, provide and improve services/products to the User;
- c. to assist TranServ in creating content that is relevant to the User;
- d. to maintain a database of all such information collected from the User;
- e. to safeguard against illegal activities like fraud, cheating, misappropriation, etc.
- f. to evaluate and administer the Platform and resolve any problems that may arise with usage of the Platform;
- g. to notify User of any major changes, for customer service purposes, providing information/updates about regulations, features, services, etc.
- h. to keep a record of the transaction history of the User as governed by existing law or policy.
- i. to determine the User's eligibility for using TranServ's products and services and such eligibility criteria may be determined by:  
(i) Us; (ii) our partners; or (iii) both (i) and (ii)

### **4. Retention Period**

The personal Information/ Sensitive Information disclosed by a user will be retained by TranServ, as long as the purposes for which such information were collected continue or for such period as prescribed under the applicable law.

### **5. Cookies**

5.1. When a User visits the Platform, one or more cookies shall be

sent to the computer or the device being used by the User to visit the Platform. Cookies are used to improve the quality of the services provided by TranServ through the Platform, including for storing User preferences, improving search results and tracking User trends.

5.2. Users will always have the option of disabling cookies via their browser preferences. However, Users are advised and made aware that if they disable cookies on their browser, some parts of the Platform may not function as effectively.

5.3. TranServ may use Google AdWords and/or other such services to advertise on third party websites to previous visitors to the Site. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Google's use of the DART cookie enables it to serve ads to its Users based on their visit to Site and other websites on the Internet. Users may opt out of the use of this DART cookie by visiting Google's privacy document.

## **6. Information Sharing and Disclosure of Personal Information and Sensitive Personal Information**

6.1. Only Persons authorized by TranServ shall have access to Personal Information/ Sensitive Personal Information disclosed to TranServ. User grants consent to TranServ for sharing Personal Information/ Sensitive Personal Information with persons who are associated with TranServ.

You are being made aware that you can at any time withdraw your consent to process the personal data shared by you with us and we shall within reasonable time, after having received such withdrawal request from you, cease to process your personal data, unless otherwise required as per the applicable law in force.

You are also being made aware that you may exercise your rights under the provisions of the Digital Personal Data Protection Act, 2023 ("Data Protection Data") and get in touch with the designated Data Protection Officer should you have any queries/concerns/grievances regarding the personal data processing at our end and/or your rights under the prevailing law.

That after your having read and understood the above, you hereby specifically consent for processing of your personal data by us in accordance with this Policy. Kindly note that Trnaserv will be free to use, collect and disclose information / personal data that is freely available in the public domain without your consent.

No liability pertaining to the authenticity/ genuineness/misrepresentation etc. of your personal data provided to us or with regard to any fraud or negligence thereof shall lie on Transerv nor we be in any way responsible to

verify any information/ personal data obtained from you. You hereby specifically agree and provide your consent thereby enabling Transerv to collect, store, transfer, process and share your personal data related to you with third parties including but not limited to Banks, financial institutions, credit information companies, payment gateways/ collecting banks etc. solely for the purpose of processing your transaction requests for the Service(s).

6.2. Notwithstanding anything contained in this Policy, TranServ reserves the right to disclose any Personal Information/ Sensitive Personal Information that may be required to be disclosed under Applicable Law, with prior notice to the User.

## **7. Disclosure to Third Party**

7.1. In case the information is being collected and retained by a third party, on behalf of TranServ, TranServ shall obtain prior permission from the User before transfer of information to any third party, unless such disclosure is necessary for compliance of a legal obligation. Such obligation is also not applicable in case such information is being transferred to a government agency, when a request for such transfer has been made by such government agency to TranServ.

7.2. TranServ may transfer Personal Information/ Sensitive Personal Information to any company or person located in India only if it is necessary for the performance of lawful contract between TranServ and such person/company, provided the same level of data protection will be adhered to by the other person/ company. TranServ cannot guarantee that such parties will keep the Personal Information/ Sensitive Personal Information confidential and TranServ will not be liable in any manner for any loss of confidentiality attributable to such third parties.

7.3. TranServ does not rent, sell or share the information being collected from Users to third parties for consideration.

## **8. Security**

8.1. TranServ has taken all reasonable measures and precautions to keep the Personal Information and Sensitive Personal Information safe and secure and to prevent any unauthorized access to or misuse of the same.

8.2. TranServ may employ procedural and technological security measures, consistent with the relevant industry practice. Such measures are reasonably designed to help protect the Personal Information/Sensitive Personal Information from loss, unauthorized access, disclosure, alteration or destruction. TranServ may also use encryption, secure socket layer, firewalls, internal restriction, password protection and other security measures to help prevent unauthorized access to the Personal Information/Sensitive Personal Information.

8.3. TranServ shall not be liable to any User for any loss, damage (whether direct, indirect, consequential or incidental) or harm caused to the User due to the unauthorized access or misuse of the Personal Information/ Sensitive Personal Information by any third party (beyond the control of TranServ).

## **9. Linking to other mobile app/sites**

TranServ is not responsible for the privacy practices or the content of any other mobile app/websites for which links may be provided on the Platform or which provides links to the Platform. By clicking on a link, logo or other such items, or using certain services available on the Platform , the User may no longer be on the Platform and in such circumstances the privacy policy (if any) of such other mobile app/website shall apply. TranServ encourages Users to read the privacy policy/ statement of such other mobile apps/websites.

## **10. Aggregate Information**

TranServ may track the total number of visitors, IP addresses, geographical location, age group and gender of Users, etc. and may analyze this data for trends and statistics in the aggregate. However, such information will be maintained, used, and disclosed in aggregate form only and will not contain any Personal Information/Personal Sensitive Information. TranServ may use such information to analyze various trends and gather broad demographic information for aggregate use. TranServ may share this aggregate information with third parties to assist them in targeting advertisements to appropriate audiences.

## **11. Contact Us**

If you have any questions, comments, concerns or grievances about this Policy or about how we handle your personal data or if you wish to report a violation of the Terms of Use or this Policy and have any question or need assistance, please contact us at [support@dhani.com](mailto:support@dhani.com)

## **12. Updates**

TranServ reserves the right to update / change / alter or update the Terms of Use or this Privacy Policy from time to time to incorporate necessary changes in technology, applicable laws or any other variant. Any update made will be effective immediately. Use of the services provided by TranServ after such update will be deemed acceptance of such changes. Users are advised to review this Policy periodically on the Platform to ensure that you are aware of the latest version.

## **13. Governing Law and Jurisdiction**

This policy will be governed by and construed in accordance with the laws of India and subject to the exclusive jurisdiction of Courts at Delhi.