



Vayana TradeXchange (VTX)

Owned & operated by Vayana IFSC Private Ltd.

Privacy policy

Privacy policy- Version 1- dated 24 July 2023

Document Initiated By: Namit Gattani- SVP

Document Approved By: Kalyan Basu- MD & CEO

Privacy Policy

We recognize the importance and criticality of the privacy of our users and are committed to maintain confidentiality of the information provided in terms of applicable regulatory framework. This policy (hereinafter “Privacy Policy” or “Privacy and Security Policy”) sets out how we collect, process, use and may disclose your data when you avail our services or use our website and related applications or other similar devices and our tools under the brand name of Vayana Trade Exchange (hereinafter referred to as “VTX” or “Platform”). In this Privacy Policy, any reference to “we”, “our”, “us” “Vayana Trade Exchange”, “VTX” or the “Company” shall mean “Vayana (IFSC) Private Limited” and “you”, “your”, “user” or “customer” shall mean any person or entity using the Platform. By accessing Platform and/or using our services, you hereby declare that you have read, understood and agreed to this Privacy Policy.

DATA PROTECTION & DATA PRIVACY

We will be collecting information including personal information of our users in order to provide services and to perform our obligations in relation to such services, including as per laws applicable in IFSC, which shall be used by Vayana (IFSC) Private Limited for processing. We are committed to maintaining the confidentiality, integrity and security of data and information of our users.

DATA WE COLLECT:

Signup or Registration Details:

Features of the VTX Service may require registration and while creating an account or registering on our Platform, we may collect data like user name, mobile number, email address, password, gender, Internet Protocol (IP) address, location, zip code, date of sign up/registration, age related data to confirm that you are of the appropriate age to access our Platform or other age specific features of our Platform (collectively the “**Registration Information**”).

We may collect your phone number or email address in order to send you a One-Time-Password ("OTP"), which you confirm by entering the OTP to verify your identity, while registering with our Platform.

In order to benefit from the full functionality of the service, the customer may also need to provide the customer’s relevant account credentials (“**Account Credentials**”) to allow Vayana (IFSC) Private Limited to access the status of the fulfillment of transactions (“**Account Information**”) for the purpose of transaction processing.

Information we collect automatically:

We collect certain information automatically when you use our Platform whether through the use of cookies, scripts, log files, web beacons, to provide you better experience of the Platform.

We may automatically collect information including but not limited to -

- Information such as your mobile carrier-related information, configuration information made available by your web browser or other programs you use to access the Platform, your Internet Protocol (IP) address and your device's version and identification number.
- Information such as what you have searched for and looked at while using the Platform.
- details of your interactions with our customer support team regarding any assistance that you may require in respect of our Platform along with the date, time and reason for which you contacted us, transcripts of any chat conversations, and if you call us, your phone number and call recordings;
- We also collect your location when you use our Platform, which helps us offer appropriate features. Your location can be determined with varying degrees of accuracy by GPS and IP address.

Information from websites and apps:

We may collect information when you visit or use third-party websites and apps through our Platform. This includes information about the websites and apps that you visit, your use of our Platform on those websites and apps, as well as information the developer or publisher of the app or website provides to you or us.

These third-party websites that are not subject to this Privacy Policy hence we recommend that you read a third party's terms and conditions and privacy policy carefully before providing any personal information on a third-party website, as we cannot accept any responsibility or liability for those third-party websites and apps you visit through our Platform.

Cookies:

“Cookies” are alphanumeric identifiers in the form of text files that are inserted and stored by the customer's web browser on the customer's computer's hard drive.

VTX Cookies: We may gather information about the customer through cookie technology. For example, We may assign a cookie to a customer, to limit the amount of times a customer sees particular information or to help better determine which information or preference settings to serve to a customer. Please note that most Internet browsers will allow the Customer to stop cookies from being stored on the customer's computer and to delete cookies stored on the customer's computer. If the Customer or other users choose to eliminate cookies, the full functionality of our services may be impaired for the customer.

VTX Cookies are encrypted so that only VTX can interpret the information stored in them.

Third party Cookies: The Website allows cookies of social plugins of several third parties. This enables a user to share content of the Website on certain social networks. These plugins also enhance the user friendliness of the Website. For example, with the Facebook plugin on the Website, users can simply register themselves on the Website with their Facebook account details. The (use of the) data collected by these third parties via the social plugins are exclusively determined by such third party as we cannot read these cookies (nor can these parties read the cookies of VTX).

Web beacons: Web beacons are images embedded in a web page or email for the purpose of measuring and analyzing site usage and activity. Vayana (IFSC) Private Limited, or third party service providers acting on Vayana (IFSC) Private Limited's behalf, may use web beacons to help us analyze Platform/Website usage and improve the service.

Third Party Service Providers

We may use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of Our online campaigns or analyze visitor activity on VTX. We may permit these service providers to use cookies and other technologies to perform these services for VTX. We do not share any personal information about the customers with these third-party service providers without the customer's consent, and these service providers do not collect such information on Our behalf.

Our third-party service providers are required to comply fully with this Privacy and Security Policy.

HOW WE USE THE DATA COLLECTED:

We will not sell or rent your confidential/personal information to any third party, for any reason, at any time. We shall use and disclose the customer's information as detailed below:

- To facilitate the processing of the trade finance transaction;
- to analyze the Platform usage and improve the service offered by the Company;
- to deliver to the customer communications relevant to the customer's use of the service, any administrative notices, money alerts and such other communications considered necessary and appropriate in provision of services offered by the Company;
- to fulfill the customer's requests for the products and services offered by the Company;
- to such third-party contractors that provide services to Vayana (IFSC) Private Limited and are bound by these same privacy restrictions as are stipulated herein;
- to provide payment history information to the bank/financial institution providing financing or to a Credit Bureau established under the applicable rules and regulations.
- to enforce Vayana (IFSC) Private Limited's Terms of Use; and
- as otherwise set forth in this Privacy and Security Policy.

The transaction information including customer data is strictly restricted to Vayana (IFSC) Private Limited, its employees and contractors, on need-to-know basis, and in accordance with specific internal procedures and safeguard governing access, in order to operate, develop or improve the service offered by the Company. These individuals have been selected in accordance with Vayana (IFSC) Private Limited's security policies and practices and are bound by confidentiality obligations. They may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

DISCLOSURE OF CUSTOMER'S INFORMATION TO PROTECT VAYANA IFSC PVT. LTD.'S RIGHTS OR IF REQUIRED BY LAW

Notwithstanding the foregoing, Vayana (IFSC) Private Limited reserves the right (and the customer authorizes Vayana (IFSC) Private Limited) to share or disclose the customer's information including personal information, when Vayana (IFSC) Private Limited determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

- To enforce Vayana (IFSC) Private Limited rights against the customer or in connection with a breach by the customer of this Privacy and Security Policy or Vayana (IFSC) Private Limited's Terms of Use;
- To prevent prohibited or illegal activities; or

- When required by any applicable law, rule regulation, subpoena or other legal process.

THE CUSTOMER'S DATA MAY BE TRANSFERRED UPON ACQUISITION OF VAYANA (IFSC) PRIVATE LIMITED IN ACCORDANCE WITH THIS POLICY

Credential information may, with prior intimation to the customer and upon its authorization, such authorization not to be unreasonably withheld, be transferred to a third party as a result of a sale, acquisition, merger, re-organization or other transfer (a "Transfer") involving Vayana (IFSC) Private Limited, to continue processing of transactions. Should such a Transfer occur, Vayana (IFSC) Pvt. Ltd. will use its best efforts to require that the new combined entity follow this Privacy and Security Policy with respect to the customer's personal information, as and to the extent required by applicable law and to require that the customer receive prior notice if the customer data could be used contrary to this Policy. Pending authorization from the bank/financial institution for such a transfer of credential Information, the customer accepts that there could be disruption to services delivered by Vayana (IFSC) Private Limited.

THE CUSTOMER CAN TRANSPORT OR DELETE ITS DATA

The customer's data belongs to the customer. The customer can remove it anytime the customer wants. When the customer requests VTX to delete the customer's account for the service, the customer's data will be permanently expunged from Vayana (IFSC) Private Limited's primary production servers and further access to the customer's account will not be possible. Vayana (IFSC) Private Limited will also promptly disconnect any connection VTX had established to the customer's Account Information and delete all Account Credentials. However, anonymized data, consisting of aggregate data derived from the customer's Account Information, may remain on Our production servers indefinitely. The customer's data may also remain on a backup server or media. We keep these backups to ensure our continued ability to provide the service to the customer in the event of malfunction or damage to our primary production servers. We will also keep the audit data on its servers from a compliance perspective.

EMAIL COMMUNICATION:

We may allow Companies to subscribe to email newsletters and from time to time may transmit emails promoting Vayana (IFSC) Private Limited.

VTX subscribers have the ability to opt-out of receiving our promotional emails and to terminate their newsletter subscriptions by following the instructions in the emails. Opting out in this manner will not end transmission of service-related emails, such as email alerts.

SECURITY OF CUSTOMER'S DATA

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of the customer's online session and to protect accounts and systems from unauthorized access. When the customer registers for the service on our Platform, we require a password from the customer for the customer's privacy and security. We use industry-standard 128 bit secure socket layer (SSL) encryption to protect data transmissions between the customer's browser and VTX's servers, such as the customer's Registration Information for VTX or Account Credentials.

Our servers are in a secure third party facility. Our databases are protected from general employee access both physically and logically. VTX stores a salted digest for the customer's service password so that the customer's password cannot be recovered even by Vayana (IFSC) Private Limited. All backup drives and tapes are encrypted.

However, it is important to understand that these precautions apply only to VTX Site and systems. While Vayana (IFSC) Private Limited will have contractual agreements with third parties around data security, Vayana (IFSC) Private Limited exercises no control over how the customer's information is stored, maintained or displayed by third parties or on third-party sites.

VAYANA'S SERVICE ENSURES SECURE COMMUNICATION WITH ENCRYPTION

From the time the customer submits the customer's login Id and password, these communications between the customer's computer and VTX are encrypted using Secure Sockets Layer (SSL3) technology. SSL enables customer and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

THE CUSTOMER IS RESPONSIBLE FOR MAINTAINING CONFIDENTIALITY OF THE CUSTOMER'S LOGIN ID AND PASSWORD

Vayana (IFSC) Private Limited has put in place appropriate technical and security measures to secure the information collected by us and maintains strict rules to help prevent others from guessing the customer's password. We also recommend that the customer changes the customer's password periodically. The customer is responsible for maintaining the security of the customer's login Id and password. The customer must not provide these credentials to any third party. If the customer believes, their credentials have been stolen or made known to others, the customer must contact us immediately, but in any event the customer should change the customer's password immediately via the service offered on the Platform. VTX is not responsible if someone else accesses the customer's account through Registration Information they have

obtained from the customer or through a violation by the customer of this Privacy and Security Policy or Vayana (IFSC) Private Limited's Terms of Service. If the customer has a security related concern, it should contact Vayana (IFSC) Private Limited. Vayana (IFSC) Private Limited will work closely with the customer to ensure a rapid and personal response to the customer's concerns.

IN THE EVENT OF A SECURITY BREACH

Vayana (IFSC) Private Limited uses stringent security measures to prevent loss, misuse or alteration of information under our control. If any user has sufficient reason to believe that their data has been compromised or there has been a breach of security, you may write to us immediately on the contact details given in this Privacy Policy so that we may take suitable measures to either rectify the breach and inform the concerned authorities if need be.

NAME AND CONTACT DETAILS OF GRIEVANCE OFFICER.

Mr. Anthony Rajan

601, 6th Floor, Signature Building,

Block 13-B, Zone 1, GIFT SEZ,

Gandhinagar, Gujarat- 382355

Phone: +91-8088149706

Email: Anthony.Rajan@vayanatradexchange.com

CHANGES TO CUSTOMER'S REGISTRATION INFORMATION

If the customer's Registration Information changes during the customer's subscription to Vayana (IFSC) Private Limited, the customer may update it any time via the service on the Platform.

POLICY UPDATES:

Vayana (IFSC) Private Limited shall update this Privacy & Security Policy periodically. Whenever there is a change in the Privacy Policy, the customer will be notified by electronic mail or by publishing the changes on the Website.

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