

## PRIVACY POLICY

This Privacy Policy shall be effective from 24<sup>th</sup> March 2022 and was created on/last updated on 25<sup>th</sup> March 2022.

We, Dickey Asset Management Private Limited, Datter Consultants Private Limited, Dickey Consulting LLP, and DH Financial Private Limited and including its affiliates (collectively referred to as “**DHFIN Group**”) know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy describes how DHFIN Group will collect and process your personal information and data in accordance with the IT Act, 2000 (21 of 2000) and other applicable data protection laws which relate the processing of personal data, through the DHFIN Group websites that reference this Privacy Policy. Please carefully read the following policy to understand our views and practices regarding your personal data and how your personal information will be treated as you use our Website.

You agree to our use of your personal information (including sensitive personal information) in accordance with this Privacy Policy, as may be amended from time to time by us at our discretion without any prior notice. You also agree and consent to us collecting, storing, processing, transferring, and sharing your personal information (including sensitive personal information) with third parties for the purposes set out in this Privacy Policy.

While using the Website you may disclose personal information like your name, email address, and such other information as may be required. Personal information subject to this Privacy Policy will be collected and retained by DHFIN Group having its office at 1106, Indraprakash Building, Barakhamba Road, New Delhi – 110001. Our primary goal in collecting personal information is to provide the user with better responses and high interactivity.

### HOW WE COLLECT THE INFORMATION

- a) From you directly and through this Website: We may collect information through the Website when you visit. The data we collect depends on the context of your interactions with our Website.
- b) Through business interaction: We may collect information through business interaction with you or your employees.
- c) From other sources: We may receive information from other sources, such as public databases; joint marketing partners; social media platforms; or other third parties such as information about your interactions with services offered by our subsidiaries.

### INFORMATION COLLECTED

- a) We collect information primarily to provide better services to all of our customers.

- b) When you visit our Website, some information is automatically collected. This may include information such as the Operating Systems (OS) running on your device, Internet Protocol (IP) address, access times, browser type, and language, and the website you visited before our Website.
- c) The full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); cookie number; content you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs).
- d) We automatically collect information using "Cookies". Cookies are small data files stored on your hard drive the Websites. Among other things, cookies help us improve our Website, our marketing activities, and your experience. We use cookies to see which areas and features are popular and to count visits to our Site. Please see our **Cookies Policy**.
- e) Most web browsers are set to accept cookies by default. If you prefer, you can choose to set your browser to remove cookies and to reject cookies. If you set your browser to reject cookies, some features will be unavailable. For more information on how to reject cookies, see your browser's instructions on changing your cookie settings.

## **HOW WE USE INFORMATION**

- a) We use the information we collect primarily to provide, maintain, protect and improve our services.
- b) We use the information collected through this Website as described in this policy and we may use your information to:
  - i. Improve our services, Website and how we operate our businesses;
  - ii. Understand and enhance your experience using our Website;
  - iii. Provide customer support and respond to your requests, comments, and inquiries;
  - iv. Send you related information, updates, security alerts and support and administrative messages;
  - v. We may process your personal information without your knowledge or consent where required by applicable law or regulation for the purposes of verification of identity or for prevention, detection or investigation, including of cyber incidents, prosecution and punishment of offences;
  - vi. Protect, investigate and deter against fraudulent, unauthorized or illegal activity.

## **DATA TRANSFER**

When you are on this website and are asked for personal information, you are sharing that information with DHFIN Group alone, unless it is specifically stated otherwise. If the data is being collected and/or maintained by any company other than DHFIN Group, you will be notified prior to the time of the data collection or transfer.

## **DATA SECURITY**

- a) We take due care to protect customer/user data. Technical measures are in place to prevent unauthorized or unlawful access to data and against accidental loss or destruction of, or damage to, data. The employees who are dealing with the data have been trained to protect the data from any illegal or unauthorized usage.
- b) We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal customer information.
- c) We take reasonable steps to help protect your personal information in an effort to prevent the loss, misuse, and unauthorized access, disclosure alteration and destruction. It is your responsibility to protect your user names and passwords to help prevent anyone from accessing or abusing your accounts and services. You should not use or reuse the same passwords you use with other accounts as your password for our services.
- d) Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organizational measures designed to secure your information against accidental loss and unauthorized access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.
- e) Information collected from you will be stored for such period as required to complete the transaction entered into with you or such period as mandated under the applicable laws.

## **LINKS TO THIRD PARTY SITE**

Our Site may, from time to time, contain links to and from other external websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. This privacy statement does not cover the information practices of those websites linked from this Website. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

## **SHARING OF PERSONAL INFORMATION**

**As with all information, DHFIN Group will never rent or sell your personal, financial, or other information. Unfortunately, no data transmission over the internet can be guaranteed**

**to be 100% secure. As a result, while DHFIN Group strives to protect your personal information, DHFIN Group cannot ensure or warrant the security of any information you transmit to DHFIN Group and you do so at your risk. Once DHFIN Group receives your transmission, it makes its best efforts to ensure its security on its systems.**

We do not disclose or share your personally identifiable information with third parties without your prior consent other than:

- i. With third parties who work on our behalf provided such third parties adhere to the data protection principles set out in the IT Act, 2000 (21 of 2000) and other applicable legislation, or enter into a written agreement with Us requiring that the third party provide at least the same level of privacy protection as is required by such principles;
- ii. To comply with laws or to respond to lawful requests and legal process;
- iii. To protect the rights and property of Us, our agents, customers, and others including to enforce our agreements, policies and terms of use;
- iv. In an emergency, including to protect the personal safety of any person; and
- v. For the purpose of a business deal (or negotiation of a business deal) involving the sale or transfer of all or a part of our business or assets (business deals may include, for example, any merger, financing, acquisition, divestiture or bankruptcy transaction or proceeding).

#### **AMENDMENT/MODIFICATION**

We may amend/change/modify this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will change the “Last Updated” date above. You agree that your continued use of our services after such changes have been published to our services will constitute your acceptance of such revised policy.

If you have any concern about privacy or grievances with Us, please contact Us by writing a mail at **info@dhfin.in** with a thorough description or call us on **+91 12440 17026** and we will try to resolve the issue for you.