

Privacy Policy

Applicable to users of services offered by Indiabulls Limited, Dhani Loans & Services Limited ("DLSL"), Indiabulls Securities Limited (formerly known as Dhani Stocks Limited) and TranServ Limited ("TranServ") collectively referred to as the "Indiabulls", "we" or "us".

Pursuant to the Scheme of Arrangement approved by the Hon'ble National Company Law Tribunal, Chandigarh Bench ("NCLT"), Dhani Services Limited and certain other companies were amalgamated into Yaari Digital Integrated Services Limited, which was subsequently renamed as Indiabulls Limited.

I General

This privacy policy ("Policy") applies to all users ("User", "You" or "Your") accessing or using websites, mobile applications, digital platforms (collectively referred to as "Platform"), financial products or any related online services ("Services") operated by us that link to or reference this Privacy Policy.

This 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 discloses the practices and policies adopted by us as to how we collect, use, store, share and process personal data in compliance with applicable Indian laws, including:

- The Digital Personal Data Protection Act, 2023 ("DPDP Act");
- The Information Technology Act, 2000 and rules made thereunder;
- Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- Reserve Bank of India ("RBI") rules & regulations; and
- SEBI rules & regulations
- Other applicable laws, rules, regulations, circulars, and guidelines.

II Nature of the Policy

This Privacy Policy constitutes an electronic record under the Information Technology Act, 2000 and does not require any physical or digital signature. By accessing or using the Platform, you acknowledge that you have read, understood,

and agreed to the terms of this Policy and consent to the collection and processing of your personal data in accordance with applicable law.

Indiabulls Limited 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.

III. 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 3.5 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. sexual orientation; and
- d. 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.

IV Collection of Information

4.1 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.

4.2. Prior to furnishing Personal Information/ Sensitive Personal Information to us for any one or more of the purposes described above, a User must grant consent to for using the Personal Information. The Personal Information/Sensitive Personal Information will be used only for the purposes set out in Clause 4.3 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.

4.3. We may collect Personal Information and Sensitive Personal Information for a lawful purpose connected with providing financial products and services, including compliance with SEBI/RBI regulations and KYC obligations.

4.4. Indiabulls 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.

4.5. 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 (where permitted), browser language, IP address, operating system etc. ("General Information"). Such General Information collected is not Personal Information/ Sensitive Personal Information for the purpose of this Policy.

4.6. Indiabulls 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, Indiabulls may share such General Information or any analysis with any third party, at its discretion.

4.7. Permissions and Optional Data : We may request your consent for access to specific device permissions only where required for lawful purposes or core app functionality, such as:

- a. Camera access for KYC verification
- b. Location access for fraud prevention and regulatory compliance
- c. SMS access solely for OTP auto-read functionality (where enabled)
- d. Notification access for transaction alerts and security updates

We do not access personal SMS content, contacts, call logs, photos, or installed applications unless specifically required for a lawful purpose and separately consented to by you.

V. Use of Personal Information

We use personal information to:

- Customer onboarding and KYC verification
- Identity authentication
- Processing transactions and payments
- Provide you with our services
- Resolve disputes
- Troubleshoot concerns
- Help promote safe services
- Assess your interest in our services
- Inform you about offers, products, services, and updates
- Customize your experience
- Detect and protect us against errors, fraud, and other criminal activity
- Enforce our terms and conditions vis-a-vis the services accessed by you
- Improve services, analytics, and operational efficiency
- Any other purpose permitted under applicable law

We process only such personal data as is necessary for the purposes stated above.

VI Consent & Your Rights

Kindly note that the Personal Information shall be deemed to have been disclosed willingly, unconditionally, out of your own free will and without any coercion.

You are being made aware that you can at any time withdraw your consent to process the Personal Information shared by you with us and we shall within reasonable time, after having received such withdrawal request from you, cease to process your Personal Information, unless otherwise required as per the applicable law for the time being 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 and get in touch with the designated Data Protection Officer should you have any

queries/concerns/grievances regarding the processing of your Personal Information 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 Information by us in accordance with this Privacy Policy. Kindly note that information /data that is freely available in the public domain may be used, collected, shared without your consent.

No liability pertaining to the authenticity/ genuineness/misrepresentation etc. of your Personal Information provided to us or with regard to any fraud or negligence thereof shall lie on us nor we be in any way responsible to verify any information/data obtained from you.

VII Disclosure

We will not voluntarily disclose your personal information to any third party but in exceptional circumstances, we may do so if we are required by a court order, by Government Authorities, by law enforcement authorities or by other legal processes or where it becomes necessary to do so to protect the rights or property of the Indiabulls and/or its affiliates, etc. We may also disclose your information to a third party as part of a merger or transfer or any restructuring.

VIII Cookies

A “cookie” is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. Our website(s) uses cookie and tracking technology depending on the features offered. No personal information/ data/details will be collected via cookies and other tracking technology; however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.

IX Password policy

Do help us protect your privacy by maintaining the secrecy of the username and password you use for any of our Services.

X Changes to this Privacy Policy

Indiabulls Limited reserve the right to change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested to review the Privacy Policy periodically, to make sure that you are aware of any such changes. This Privacy Policy shall apply uniformly to our website(s) and mobile application(s) or any other media used by us for its Services. Any changes or updates will be effective immediately upon posting the same on our web site at www.indiabulls.com

XI Data Retention

We take reasonable steps to ensure that information about you is available only for so long as is necessary for the purpose for which it is processed, or longer if required under any contract, by applicable law, or for statistical purposes, subject to appropriate safeguards.

XII Information Sharing with Our Partners

You may use services/suite of financial products offered from a curated set of bank(s), financial institution(s), insurer(s), by lending partner(s), loan aggregator(s) etc. hereinafter individually and collectively referred to as Our Partner(s). You are made aware that the information that is stored and collected by us would be used for a lawful purpose in accordance with this Policy including but not limited to fulfilling internal operations, fulfilling requests, providing assistance for completion of online personal loan submission, improving, developing or otherwise facilitating provision of loans by the lending Partner(s).

XIII Third-Party Links And Content On Our Services

Our Services may link to third-party websites and services that are outside our control. Further, Indiabulls Limited, its affiliates, and their directors and employees accept no liability and will not be liable for any loss or damage arising directly or indirectly (including special, incidental or consequential, punitive, or exemplary loss, damage or expenses) from your use of any mobile application or any site or inability to use by any party, howsoever arising, and including any loss, damage or expense arising from, but not limited to, any defect, error, omission, interruption, imperfection,

fault, mistake or inaccuracy with any mobile or online application, its Contents (material, information, data, money market movements, news items, etc.) or associated services, or due to unavailability of any application or any part thereof or any Contents or associated services even if Indiabulls is advised of the possibility of such damages, losses or expenses.

XIV Intellectual Property Rights

Please note that We retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all information provided on or via this web site (including all texts, graphics and logos).

XV Intellectual Property Rights

Kindly note that We do not collect personal information about individuals except when such individuals specifically provide such information on a voluntary basis. Upon such voluntary disclosure of personal information, we may further verify, collate or receive information about you from publicly and commercially available sources (as permitted by law), which we may combine with other information we receive from you. We may also receive information about you from third-party social networking services if you are already connected with those services. We shall, at all times, ensure to implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of your personal data and information as the same is of vital importance to us . We are strongly committed to protecting the personal and financial information that you submit to us. Personal information of individual users will not be sold or otherwise transferred to unaffiliated third parties without your approval at the time of collection. However, please note that although we take reasonable steps to protect your information, no website, internet transmission, computer system or wireless connection is completely secure.

We shall ensure to safeguard the security and confidentiality of any information you share with us. Any of your personally identifiable information obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your personal information, we cannot warrant the security of any information you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your personal information is done at your own risk.

Your information/inputs/queries as a registered user are required to serve you better and the same shall not be shared with anyone without your consent. However, we may disclose your personal data to our agents or contractors to enable processing of transactions or communications with you “on need” basis. Your aforesaid information may be further used for assessment and analysis of our market, customers, products, and services and to understand the way people use our Services so that we can improve them and develop new products and services. However, it shall be on the basis that the agents are required to keep the information confidential and will not use the information for any other purpose other than to carry out the services they are performing for Indiabulls and/or its affiliates.

XVI No contractual obligation

Please note that this Privacy Policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

XVII Should you want to opt out/Withdrawal of Consent

If we possess your contact information, we may want to keep you posted about our products, services and events, through email. Should you prefer not to keep up to date with our news and latest information on services and receive such marketing materials, please send an email to support.dhanipay@indiabulls.com. However, such withholding of data or withdrawal of consent may result in us not being able to provide services and facilities and. We may continue to process the Personal Information until and unless we receive withdrawal of consent from you. Please note that transactional or regulatory communications may continue to be sent where required for provision of Services or compliance with legal obligations

XVIII Whom to Contact: Data Protection Officer

If you have any questions, comments, concerns or grievances about this Privacy Policy or about how we handle your Personal Information, please get in touch with our Data Protection Officer at:
Grievance Officer/Data Protection Officer
Indiabulls Limited
Email: support.dhanipay@indiabulls.com

We will endeavor to address your concerns within timelines prescribed under applicable law.

XIX Governing Laws & Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of India.

Courts located in Delhi shall have exclusive jurisdiction over disputes arising out of or relating to this Privacy Policy.