



## PRIVACY POLICY FOR AKARA

### 1 Introduction

1.1 This website [www.stashfin.com](http://www.stashfin.com), its mobile phone application(s) and other related internet-based applications including StashFin app (collectively referred to as "StashFin Platform") owned and operated by Akara Capital Advisors Private Limited, a company incorporated under the laws of the Republic of India having its Corporate Office at 1st Floor, CRC2 Building, Khasra No. 337, Sultanpur, New Delhi, 110030, India.

1.2 General terms and conditions for the use of StashFin Platform and other terms/disclaimers of StashFin Platform are incorporated hereby way of this reference. They shall be read as an integral part hereof.

### 2 General

2.1 StashFin Platform asks for and uses your personal information and is committed to keeping this information secure and protected. This Privacy Policy explains why we require personal information and how we collect, use, disclose and secure your personal information. This Privacy Policy applies to the personal information we collect from you and third parties, both online and offline. However, it does not apply to any personal information collected by third parties from you.

2.2 By accessing or using the StashFin Platform or any of its services, you signify that you have read, understood and confirm to be bound by this Privacy Policy and its modifications. We reserve the right to update or modify this Privacy Policy at any time without prior notice. Therefore, we encourage you to review this Policy each time you access our Services on StashFin Platform. We may also notify you of material changes to the Privacy Policy by e-mail or by a notice on our home page.

2.3 The following terms and definitions have been set out in this privacy policy:

- "StashFin", "we", "us", and "our" means Akara Capital Advisors Private Limited
- "you" and "your" means a user of the StashFin Platform and the products and services provided via the StashFin Platform.
- "Services" includes lending and any other related services facilitated by us via StashFin Platform.

### 3 Collection of User Information

3.1 To create an account on StashFin Platform, you must provide us with the basic details and information required as part of our Customer Identification process. You confirm to our General Terms and Conditions for the use of StashFin Platform, this Privacy Policy and other terms, which govern how we treat your information.

3.2 During the use of our Services, StashFin Platform, we may collect information about you from you and third parties. While some data has to be mandatorily provided, others are optional. Certain portions of the data will remain private, and some will be shared with associated third parties. All information you provide to us is voluntary. This information is including but not limited to, the following:

- (a) Information about you when you register or when you use our StashFin Platform
- (b) Personal and financial information like your name, e-mail address, contact number, gender, date of birth, contact information, address, employment information, payslips, academic qualification, PAN no., Driving License no., Aadhaar no., bank statements, etc.
- (c) Credit-related information that is collected from other sources like credit bureaus.
- (d) Information about your transaction history like spend data, through our app etc.
- (e) We may also collect other personal information such as SMS, contacts, location data, mobile device data etc.
- (f) Your unique identifiers, such as username and password preferences information and transaction history.
- (g) Information collected through your Facebook, Twitter, LinkedIn or other social media accounts which have been linked to the account on the StashFin Platform.
- (h) Information that you provide when you write directly to us (including by e-mail) or provide us over the telephone.
- (i) Any other information that StashFin is required to collect per a specific mandate from any bank or as a requirement under applicable law.
- (j) Electronic bank statements through a 3rd party provider.
- (k) Aggregate information and electronic data - like the pages viewed, how you navigate the website, and interact with web pages, etc.
- (l) Permissions given by you through android or iPhone operating system or other operating systems based on your informed consent inter alia for access to maps, device information like IMEI, android id/iPhone id/operating system based ID, network sockets, information about networks, information about Wi-Fi networks, camera, read-only access to phone state, including the current cellular network information, the status of any ongoing calls, user SMS data, user contacts, data in external storage like the image for selfie storage, data from external storage, allow the application to use fingerprint biometric services, details of installed applications on your device/s and other permission as may be specifically sought.

3.3 We may collect and monitor each installed applications metadata information that includes application and package name, installed and updated time, version name and version code for all applications installed on your device. These details about installed applications on your device is collected in order to decide your creditworthiness, provide customized offers and facilitate

faster approval. Such details may be collected after the registration is complete and such data is not shared with any individual or third-party application other than for the services sought by you.

3.4 The information we collect about you will depend on the products and services we offer on an ongoing basis. If you do not allow us to collect all the information we request, we may not be able to deliver all of these services effectively.

3.5 You understand that, by creating an account or by registering through third party sites, we and others will be able to identify you by your StashFin profile. However, we will not be liable under any circumstance for the generation of your profile or the information you provide therein. StashFin will also not be responsible and liable for any information collected in the form of SMS, contact, media or any other sources that the users might upload, the data collection process may extract, the use and misuse thereof. We will ask for your bank account details only for the Service.

3.6 All the information that you shall provide us is voluntary, including sensitive personal information. You understand that StashFin may use certain information of yours, which has been designated as 'sensitive personal data or information' under the applicable regulations to provide you the Services directly or through third parties.

#### 4 Use of your information

4.1 We may use the information you provide in the following ways:

- (a) To establish and confirm identity for assessing applications.
- (b) To capture the user information given in the application forms and any information uploaded on StashFin Platform by you, such as KYC documentation, bank slips and credit information.
- (c) Share the information with partner Banks, NBFCs, multiple financial institutions, and other lenders to customize offers and provide services.
- (d) To manage our customer relationships, get in touch with customers to send communications, notifications, information, or process queries and applications made by customers on StashFin Platform as well as to you about other products or services we think you might find of some use.
- (e) Design our products, offer our products and services, manage our risks, including the risk of fraud.
- (f) Analyze how the StashFin Platform is used, diagnose service or technical problems and maintain security.
- (g) Monitor, improve and administer StashFin Platform.
- (h) Comply with country laws and regulations.
- (i) Use this information in other ways permitted by law.

4.2 We use personal information to provide you with services & products you explicitly requested for, to resolve disputes, troubleshoot concerns, help promote safe services, collect money, measure consumer interest in our services, inform you about offers, products, services, updates, customize your experience, detect & protect us against error, fraud and other criminal activity, enforce our terms and conditions, etc.

4.3 We also use your contact information to send you offers based on your previous orders and interests.

4.4 We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, gender, etc.).

4.5 We use data submitted by you to customize your experience at StashFin Platform, providing you with content that we think you might be interested in and display content according to your preferences.

#### 5 Third-party sharing of your information

5.1 We will take the utmost care to ensure that your personal information is not shared with the public and that your transactions on the StashFin Platform are confidential. If we use any third parties for any of these transactions, we will also ensure that confidentiality is maintained with these authorized third parties. We only share your personal information with unaffiliated third parties as permitted or required by law. When we share your personal information with vendors and service providers who perform functions on our behalf, they informed to keep your information confidential and secure and use it only as is reasonably necessary to carry out their work or comply with applicable law.

5.2 We may share your personal information with affiliates and joint marketing campaigns with other financial companies. Also, personal information may be disclosed or transferred to our affiliates and as part of, or during negotiations of, a merger, consolidation, sale of company assets or equity, financing, acquisition, strategic alliance or in any other situation where personal information may be transferred as one of the business assets of StashFin.

#### 6 Protecting your information

6.1 We maintain administrative, technical and physical safeguards designed to protect the security, confidentiality and integrity of your personal information. We store all the customer data on AWS cloud servers to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls, SSL data encryption and access authorization controls. Also, your personal information resides on servers or in areas of facilities that only selected StashFin personnel and contractors have access to.

6.2 However, you understand and accept that there's no guarantee that data transmission over the Internet will be completely secure and that any information that you transmit to us is at your own risk. We assume no liability for any disclosure of data due to errors in transmission, unauthorized third party access to StashFin Platform and databases or other acts of third parties, or acts or omissions beyond our reasonable control and you shall not be entitled to hold StashFin responsible for any breach of security.

#### 7 Your choices regarding your personal information

7.1 Personal information not collected on the StashFin Platform or in connection with the Service is not generally subject to this Privacy Policy. The StashFin Platform may contain links to other websites that may collect personal information. For example,

StashFin may have relationships with various service providers whose services you might find useful and available to you from the StashFin Platform, from websites linked to the StashFin Platform, or in connection with the Service. Those providers may require you to provide personal information to use their services. Unless expressly provided to the contrary, the privacy policy applicable to that website, and not this Privacy Policy, will govern the collection, use, disclosure and security of your personal information.

7.2 You can access all of your personal and personally identifiable information that we collect online and maintain by logging in to your account and going to "My Profile". This section of the site is password-protected to safeguard your information better. To protect the confidentiality of such personal data, you should not divulge your password to anyone. You are responsible for all uses of the StashFin Platform by any person using your customer ID and password. As a registered user, you can update, physical address, phone numbers, education and employment information at any time on the website. If you need to change any other information in your profile, contact us through the chat feature on the StashFin Platform.

7.3 You can contact us or mute the notification yourself in our application for withdrawing your consent to provide the personal information.

## 8 Tracking, use of cookies, web beacons and similar tracking devices

8.1 Cookies are small data files that a website stores on your computer. StashFin Platform uses cookies for security and to personalize your web browsing experience.

8.2 We may use cookies for some situations, such as,

- (a) To allocate an identification number to your Internet browser (you cannot be identified from this number)
- (b) To make StashFin Platform more user friendly
- (c) To determine if you have previously visited the StashFin Platform
- (d) To track and report on StashFin Platform and online campaign performance
- (e) To identify other pages or third parties' websites you have accessed, and
- (f) For fraud detection and security purposes
- (g) You can configure your browser so that it does not receive cookies. However, this means you will be unable to use secure services that require cookies to participate

## 9 Information from advertisements on other websites

9.1 We place and track advertisements on third-party websites. Like many advertisers, we advertise our products and services. We contract with third parties to place advertisements on websites not affiliated with us where we think the advertisements are likely to be most relevant. These advertisements may contain cookies or other mechanisms that allow tracking of your response to our ads. Our contracted third parties and we track and report performance of our advertising and marketing campaigns by using cookies, web beacons, and other similar technology, which may be used to collect and store information about user visits, page visits and duration, and/or the specific ad or link that the user clicked on to visit the site.

## 10 Communication

10.1 When you contact StashFin or StashFin contacts you directly or by service providers of StashFin through phone, e-mail or electronic means, at the discretion of StashFin such communications may be stored or recorded by the StashFin or its service providers for the purpose of improvements in customer engagement and to offer more services.

10.2 Use of StashFin Platform in any manner by a user shall be deemed as an acceptance to the above by the concerned user.

## 11 Contacting StashFin

11.1 In case you need any details or clarifications or redressal of grievances or have any feedback regarding our Privacy Policy or believe that StashFin has not complied with this Privacy Policy concerning your personal information, please contact us at [www.stashfin.com/contact-us](http://www.stashfin.com/contact-us). If you are reporting noncompliance with this Privacy Policy, in your e-mail or letter, please describe in as much detail as possible (but without disclosing any sensitive information about you or third parties) how you believe that the Privacy Policy has not been complied with.

I CONFIRM TO THE ABOVE THROUGH ONLINE/ELECTRONIC MEANS. I HEREBY CONFIRM THAT ACCEPTANCE OF THE ABOVE TERMS AND CONDITIONS WAS COMPLETED ONLINE FOR MY CONVENIENCE.

"APPLIED, ACCEPTED, AUTHENTICATED, SIGNED AND DELIVERED BY ME BY ENTERING THE ONE-TIME PASSWORD (OTP) ON 11-04-2022 AT 13:04:33 THROUGH IP ADDRESS 127.0.0.1"

### **Contact Us**

Name: Akara Capital Advisors Private Limited

Address: CRC-2, 1st Floor, Khasra No. 337, Mehrauli-Gurgaon Rd, Sultanpur, New Delhi, Delhi 110030

Email Id: [cofficer@akaracap.com](mailto:cofficer@akaracap.com)

Contact No: +91-7065254281

Contact	Sanjeev Walia
Person:	
Nodal Officer:	Sanjeev Walia