

**RIVIERA INVESTORS PRIVATE LIMITED**

**PRIVACY POLICY**

<b>Effective Date</b>	<b>September 16, 2022</b>
<b>Version</b>	3.0
<b>Prepared By</b>	Compliance and Secretarial Department
<b>Approved By</b>	Mr. Alok Mittal, Director and Mr. Siddharth Mahanot, Whole time director

**Document History**

<b>Version No.</b>	<b>Effective Date</b>	<b>Prepared by</b>	<b>Approved by</b>	<b>Changes made</b>
1.0	January 24, 2017	Compliance and Secretarial Department	Mr. Alok Mittal, Director and Mr. Siddharth Mahanot, Whole time director	NA
2.0	July 21, 2021	Compliance and Secretarial Department	Mr. Alok Mittal, Director and Mr. Siddharth Mahanot, Whole time director	Added the details of Riviera Grievance Redressal Officer
3.0	September 16, 2022	Compliance and Secretarial Department	Mr. Alok Mittal, Director and Mr. Siddharth Mahanot, Whole time director	Added the details of Riviera Grievance Redressal Officer

## PRIVACY POLICY

**Riviera Investors (P) Ltd**, a non-deposit-taking non-banking financial company registered with the Reserve Bank of India and having its registered office at **C-902, Park View SPA, Near DPS Primary Wing, Sector 47, Gurgaon-122001**, owns, manages and operates this platform under the brand name 'Riviera' (hereinafter referred as "**Company**", "**We**", "**Us**" or "**Our**").

We respect Your privacy and are committed to protecting it through Our compliance with this privacy policy. This policy describes:

- the types of information that We may collect from you when you access or use Our website(s), application(s) and other online platform(s) (collectively, Our "**Platforms**"); and
- Our practices for collecting, using, maintaining, protecting and disclosing that information.

For the purposes of this privacy policy the term "**User(s)**" and wherever the context so requires "**You**", "**Your**", "**Yourself**" shall mean any natural or legal person who accesses or uses the Platform and in the event that a natural person is representing a business entity or a body corporate, reference to such terms shall include a reference to such business entity and/or body corporate as well.

### Your acknowledgment and consent

By visiting this Platform you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access Our Platforms.

By mere use of the Platforms, you expressly and unconditionally agree to the terms and conditions of this Privacy Policy and consent to the usage, storage and handling of the information submitted by You in accordance with the terms contained herein.

This policy applies only to the information We collect through Our Platforms, in email, text and other electronic communications sent through or in connection therewith (collectively "**User Information**"). When You submit User Information on the Platform, it shall be deemed that You have granted Us the right to collect, store, process, handle and use such User Information, in accordance with this Privacy Policy (as amended from time to time).

This policy does not apply to information that you provide to, or that is collected by, any third-party, such as other lenders who provide loans, merchants from which you avail services and social networks that you use in connection with Our services. We encourage you to consult directly with such third-parties about their privacy practices.

Please read this policy carefully to understand Our policies and practices regarding Your information and how it will be treated in accordance with this policy.

## 1. INFORMATION THAT IS COLLECTED BY US

We collect various types of information from and about Users of Our Platform, including:

- that which can be used to uniquely identify or contact a person and/or the business entity that a person represents; and/or
- financial data and transaction data pertaining to Users collected from partnering merchants; and/or
- bureau data collected from financial organisations (including, inter-alia, TransUnion CIBIL Limited and other credit bureaus)
- information that You agree to share with Us for the availing of services provided by Us.

We collect this information:

- directly or indirectly from You when You provide it to us; and/or
- as You navigate through Our Platforms (information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies).
- Through independent third party sources like merchants, financial organisations (including including, inter-alia, TransUnion CIBIL Limited and other credit bureaus), etc.

### **Information You Provide to Us**

The information We collect on or through Our Platforms shall include *inter alia*:

- Your full name, address, email address, telephone number, date of birth and bank or payment card details and any proof of Your identity and/or address, postal code, profile picture, password and other information You may provide with Your account (including but not limited to, account holder, account name, account number, online banking PIN, transaction authentication number “TAN” and password, available balance and transaction history of Your bank account), ITR, Tax Certificates or any other income documents as necessary by Us, such as Your gender, mobile phone number and website and all other information, you may provide Us through third-party sign-in services such as Facebook and Google Plus. In such events/ cases, We fetch and store whatever information is made available to Us by you through these sign-in services;
- Your preferences including settings such as time zone and language;
- Information obtained through mobile devices to determine creditworthiness, etc.
- Details of credit, debit, other cards, internet banking used by You for transactions;
- Details of Your visits to Platform, including but not limited to, location data, web logs and other communication data;

- Information provided, uploaded, shared by You through Our Platforms, including *inter alia* your PAN details, TAN details, details of incorporation, government and business related approvals/ consents/ licenses, tax certificates, invoices, reviews, photographs, comments, lists, followers, the users You follow, current and prior purchase or browsing details, contact or notification information, and other information in Your account profile;
- Your search details such as search terms you have looked up and results You selected;
- Your browsing details including time, frequency, features used, etc. by You;
- Communications between You and other lenders, merchants, and other third parties through Our Platforms; participation by You in a survey, poll, sweepstakes, contest or promotion scheme; Your request for certain features (e.g., newsletters, updates or other products/ services); Your communication with Us about employment opportunities posted;
- If You avail any services through Our Platforms, We may collect and store information about You to process Your requests and automatically complete forms for future transactions, including (but not limited to) Your phone number, address, email, billing information and credit or payment card information. This information may be shared with third-parties which assist in processing and fulfilling Your requests, including PCI compliant payment gateway processors, card associations, payment aggregators, other lenders, etc. When You submit credit or payment card information, We encrypt the information using industry standard technologies. If You write reviews about businesses/ services with which You conduct transactions through Our Platforms, We may publicly display information that You transacted with those businesses/ services;
- The information provided by You such as ratings, reviews, tips, photos, comments, likes, bookmarks, friends, lists, etc. to be published or displayed (hereinafter, "**posted**") on publicly accessible areas of Our Platforms, or transmitted to other Users of Our Platforms or third-parties (collectively, "**User Inputs**"). Your User Inputs are posted on and transmitted to others at Your own risk. Although We limit access to certain pages, You may set certain privacy settings for such information through Your account profile. PLEASE BE AWARE THAT NO SECURITY/ DATA PROTECTION MEASURES ARE PERFECT OR IMPENETRABLE. ADDITIONALLY, WE CANNOT CONTROL THE ACTIONS OF OTHER USERS OF OUR PLATFORMS WITH WHOM YOU MAY CHOOSE TO SHARE YOUR USER CONTRIBUTIONS. THEREFORE, WE CANNOT AND DO NOT GUARANTEE THAT YOUR USER INPUTS WILL NOT BE VIEWED BY UNAUTHORIZED PERSONS. We may display this information on the Platforms, share it with businesses, and further distribute it to a wider audience through third party sites and services. You should be careful about revealing any sensitive details about Yourself in such postings; and
- Information collected through cookies.

Where possible, We indicate which fields are mandatory and which fields are optional to be filled on the Platform. You always have the option to not provide information by choosing not to submit particular information or feature on the Platform.

By using this Platform, You consent to the collection, storage, and use of the User Information that you provide for any of the services that We offer, and You consent to Our collection of any changes or updates that you may provide to the User Information. The Company collects only such User Information that the Company believes to be relevant for the purpose of identification and verification and is required to understand You or Your interests or provide services that You may require or request. IT IS CLARIFIED THAT WE SHALL NOT BE LIABLE, FOR ANY REASON WHATSOEVER, FOR THE AUTHENTICITY OF ANY USER INFORMATION PROVIDED BY YOU TO US. YOU HEREBY REPRESENT, WARRANT AND CONFIRM THAT THE USER INFORMATION PROVIDED BY YOU IS AND SHALL CONTINUE TO BE VALID, TRUE AND ACCURATE.

### **Information received from Third Parties**

We will be collecting, processing and storing Your user ID associated with any social media account (such as Your Facebook and Google account) that you use to sign into the Platform or connect with or use the Platform.

Also, information will be collected about You from third parties such as partners, merchants, marketers, third-party websites, and researchers.

### **Information Collected Through Platforms**

Information may be collected automatically from the computer or devices (including mobile devices and information contained therein) You use to access the Platforms, even if you use the Platforms without registering or logging in and the same shall include *inter alia*:

- Your server's IP address from where the Platform is being accessed, the type of browser (Internet Explorer, Firefox, Opera, Google Chrome etc.), the operating system of Your system and the website You last visited before visiting to Platform, and Your computer, Internet connection and mobile device, other browsing information (connection, speed, connection type etc.), device type, device's unique device identifier, mobile network information and the device's telephone number;
- Details of Your use of Our Platforms, including location data, traffic data, logs and other communication data and the resources that You use and access on or through Our Platforms;
- We also may access metadata and other information associated with other files stored on Your mobile device. This may include, for example, photographs, audio and video clips, personal contacts and address book information;
- We may also collect real-time information about the location of Your device, as permitted by You;
- Unique mobile device identifier (e.g. IDFA or other device IDs on Apple devices like the iPhone and iPad), if You are using Our Platforms on a mobile device, We may use mobile device IDs (the unique identifier assigned to a device by the manufacturer), instead of cookies, to recognize You. Unlike cookies, mobile device IDs cannot be deleted from records. We may share it with advertising companies and they may use device IDs to track

Your use of Our applications, track the number of advertisements displayed, measure advertising performance and display advertisements that are more relevant to You. We may also share it with analytics companies which may use mobile device IDs to track Your usage of Our applications/ Platforms;

- Other information relating to Your activity on the Platforms, such as Your search queries, comments, domain names, search results selected, number of clicks, pages viewed and the order of those pages, how long You visited Our Platforms, the date and time you used the Platforms, error logs, and other similar information;
- Your locations details including the latitude, longitude or altitude of Your mobile device, GPS location;
- In case of mobile application users, the online or offline status of Your application.

### **Other tools and Cookies**

We, and third parties with whom We partner, shall use pixel tags, cookies, web beacons, mobile device IDs, “flash cookies” and similar files or technologies to collect and store information in respect to Your use of and third party websites and the Platforms. A cookie can be understood as a small text file that is stored on Your computer/ mobile that enables Us to recognize You (for example, as a registered user) when You visit Our Platform, website, store Your preferences and settings, enhance Your experience by delivering content and advertising specific to Your interests, perform research and analytics, track Your use of Our Platforms, and assist with security and administrative functions This anonymous information is maintained distinctly and is not linked to the User Information You submit to the Company. A pixel tag (also called a web beacon) can be understood as a small graphic with embedded invisibly on a webpage (or an online ad or email) and a unique identifier, and is used to count or track things like activity on a webpage or ad impressions or clicks, as well as to access cookies stored on Users’ computers. Additionally, You may encounter cookies or other similar devices on certain pages of the Platform that are placed by third parties. We do not control the use of cookies by third parties and shall not be liable for any reason whatsoever for these third party cookies. We advise You to check their privacy policies for information about third parties cookies and other practices. We do not control the practices of such third parties/ partners and their privacy policies/ cookies policies which govern their interactions with You.

Kindly note that most browsers are set to automatically allow cookies. Most cookies are session cookies that are automatically deleted from Your hard drive when You close the browser. HOWEVER, IT MAY BE POSSIBLE TO DISABLE SOME (BUT NOT ALL) COOKIES THROUGH YOUR MOBILE DEVICE OR BROWSER SETTINGS, BUT DOING SO MAY INTERFERE WITH CERTAIN FUNCTIONALITIES ON THE PLATFORM.

## **2. USE AND DISCLOSURE OF INFORMATION COLLECTED**

### **Usages**

Information collected from You can be used for various purposes including *inter alia*:

- Verifying Your identity;
- Facilitate Your usage of Platform;
- To connect You with the other lenders/ merchants/ other third parties;
- To process and respond to Your queries/ requests;
- To inform You regarding changes in Platform;
- To send You surveys and marketing communications that We believe may be of interest to You
- To analyse, conduct internal reviews, surveys and understand Our Users, improve the content and features of Our Platform, process and complete Your transactions, and make special offers;
- To diagnose technical problems, provide support and help You in addressing troubleshoot problems;
- To send and received communications, show advertisements, notifications;
- To prepare reports, review, etc.;
- To contact You regarding third party services, offers, to understand Your preferences, requirements;
- To permit You to participate in interactive features offered through Our Platform;
- To improve the content and protecting the integrity of the Platform;
- To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law;
- To detect and protect any error, hacking, fraud, commercial and identity checks; and
- Any other purpose as required in connection with the Platform.

### **Disclosures**

Information collected from You or on/ through the Platform may be disclosed to and/ or for various purposes including *inter alia*:

- For legal purposes, requirements, to comply with applicable laws;
- To Our affiliates, subsidiaries and related parties;
- To Our partners, other lenders, merchants, , contractors, service providers and other third-parties and persons who are bound by contractual obligations to keep personal

information confidential and use it only for the purposes for which We disclose it to them;

- Usages mentioned above;
- Any person for maintaining security, operating Platforms, to enquire or protect from any fraud, hacking;
- To third-parties to market their products or services to You;
- For any other purpose in connection with the aforesaid;
- For enforcing or applying Our terms of use and other agreements, including for billing and collection purposes;
- If the disclosure, in Our opinion, is necessary or appropriate to protect Our rights, property, or safety, customers or others. This will include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction; and
- To grow Our business/ Platform and/ or help Us serve You and other customers better.

### **3. PAYMENT CARD INFORMATION**

To avail certain services from other lenders/ merchants/ service providers through Our Platform, We may require credit, debit card and/ or internet banking account information. Hence, by submitting Your credit, debit card and/ or internet banking account information through Our Platform, You expressly consent to the sharing of Your information with the sellers/ merchants, third-party payment processors, payment gateways, payment aggregators and other third-party service providers (including but not limited to vendors who provide fraud detection services to Us, partner lenders and other third parties).

### **4. ACCOUNT CLOSURE AND INFORMATION**

You can close Your account through a written request addressed to the Company's representatives (as identified on the 'Contact Us' page on the Platform). We will remove Your public posts from view and/or dissociate them from Your account profile, BUT WE MAY RETAIN INFORMATION ABOUT YOU FOR THE PURPOSES AUTHORIZED UNDER THIS PRIVACY POLICY UNLESS PROHIBITED BY LAW. If You would like to review, change or delete personal information We have collected from You, or permanently delete Your account, please send us a written request in the manner detailed hereinabove.

If You delete Your information from Our Platforms, copies of Your information may remain viewable in cached and archived pages, or might have been copied or stored by other users of Our websites/ servers.

### **5. PERSONS BELOW 18**

The Platforms are not intended for Users under the age of 18 years. We do not knowingly collect



any personal information from persons under the age of 18 years or market to or solicit information from anyone under the age of 18 years.

**6. THIRD PARTY LINKS**

The Platforms links to other websites/ applications, which may collect personally identifiable information about You. The Company is not and will not be responsible for the privacy practices or the content of those linked websites. Company is not responsible for any form of transmission, whatsoever, received by You from any third party platform. We do not endorse or make any representations about third-party websites or services. Our Privacy Policy does not cover the information You choose to provide to or that is collected by these third parties. Under no circumstances shall We be deemed to control or guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, cookies, messages or other materials available on such platforms. We strongly encourage you to read such third parties' privacy policies.

**7. ADVERTISEMENTS**

We use third-party advertising companies/ entities to serve advertisements when You visit Our Platforms. These entities may use information (not including Your name, address, email address, or telephone number) about Your visits to the Platform and other websites in order to provide advertisements about goods and services of interest to You.

**8. DATA PROTECTION**

To prevent any form of unlawful interception or misuse of User Information, We use reasonable physical, electronic, and managerial procedures to safeguard and secure the User Information collected. We use reasonable secure and technologically appropriate measures, in compliance with the Information Technology Act, 2000 and the rules related thereto to protect You against loss or misuse of Your User Information including internal reviews of data collection, storage and processing practices and other reasonable security measures which are equivalent to security measures that Company uses to protect its own confidential information. We have implemented technical and organizational measures designed to secure the Your personal and commercial information from accidental loss and unauthorized access, use, alteration or disclosure. However, no method of transmission over the internet or via mobile device, or method of electronic storage, is 100% secure. Therefore, while We strive to use commercially acceptable means to protect Your personal information, We cannot guarantee its absolute security. YOU, HEREBY ACKNOWLEDGE AND ACCEPT THAT PROVIDING PERSONAL AND COMMERCIAL INFORMATION IS AT YOUR OWN RISK AND THAT THE COMPANY WILL NOT BE HELD LIABLE FOR ANY LOSSES OR DAMAGES INCURRED.

NOTWITHSTANDING ANYTHING CONTAINED HEREIN, WE SHALL NOT BE LIABLE OR RESPONSIBLE FOR DISCLOSURE OF YOUR INFORMATION DUE TO ERRORS IN TRANSMISSION, UNAUTHORIZED THIRD-PARTY ACCESS, OR OTHER CAUSES BEYOND OUR CONTROL OR FORCE MEASURE OR HACKING. You should not share Your user name, password, or other security information relating to Your account with anyone. If We receive instructions using Your user name and password, We will consider that You have authorized the instructions. You agree and confirm that Your User Information may be transferred, processed and stored. You hereby confirm that You have been

made aware of the security measures undertaken by Us and You expressly consent to Us storing, handling, using Your User Information.

Further, you agree that you shall not engage in any activity of data scraping or data crawling on the Platform and usage of web crawling or web scrapping software for accessing the Platform would be considered to be an unauthorised access.

## **9. INTELLECTUAL PROPERTY RIGHTS**

All content on Our Platform, including graphics, text, icons, interfaces, audio clips, logos, images, reviews, comments and software is the property of the Company and/or its content suppliers and is protected by Indian and international copyright laws and other applicable intellectual property laws. Any use, including the reproduction, modification, distribution, transmission, republication, display or performance, of the content on this Platform can only be made with the express written permission of the Company. All other trademarks, brands and copyrights other than those belonging to the Company, belong to their respective owners and are their property. You shall not modify the paper or digital copies of any materials you have printed off or downloaded in any way on or from the Platform, and you must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text. YOU MUST NOT USE ANY PART OF THE CONTENT ON OUR PLATFORM FOR COMMERCIAL PURPOSES WITHOUT OBTAINING A WRITTEN LICENCE TO DO SO FROM US OR OUR LICENSORS. IF YOU PRINT OFF, COPY OR DOWNLOAD ANY PART OF OUR PLATFORM IN BREACH OF THE TERMS HEREOF, YOUR RIGHT TO USE OUR PLATFORM WILL CEASE IMMEDIATELY AND YOU SHALL, AT OUR OPTION, RETURN OR DESTROY ANY COPIES OF THE MATERIALS YOU HAVE MADE.

## **10. APPLICATION FOR JOB**

If Your information is submitted to Us through Our Platform when applying for a position with the Company, the information will be used to consider Your application. We may retain Your information for any period of time. This information may be shared with other companies for the purpose of evaluating Your qualifications for the particular position or other available positions, as well as with third-party service providers retained by Us to collect, maintain and analyze candidate submissions for job postings.

## **11. AMENDMENTS TO THIS PRIVACY POLICY**

OUR PRIVACY POLICY IS SUBJECT TO CHANGE AT ANY TIME WITHOUT NOTICE. WE RESERVE THE RIGHT TO UPDATE, MODIFY AND AMEND ANY TERMS OF THIS PRIVACY POLICY FROM TIME TO TIME TO REFLECT CHANGES IN THE LAW, OUR DATA COLLECTION AND USE PRACTICES, THE FEATURES OF OUR SERVICES, OR ADVANCES IN TECHNOLOGY. Please check this page periodically for changes. Use of information We collect is subject to the Privacy Policy in effect at the time such information is used. If We make any material changes to this Privacy Policy, We will post the changes here. Please review the changes carefully. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing or availing the Platform for availing the services. Your continued use of the Services following the posting of changes to this Privacy Policy will constitute Your consent and acceptance of those changes.

## **12. FORCE MAJEURE**

Notwithstanding anything contained in this Privacy Policy or elsewhere, We shall not be held responsible for any loss, damage or misuse of Your User Information, if such loss, damage or misuse is attributable to a Force Majeure Event. A "**Force Majeure Event**" shall mean any event that is beyond Our reasonable control and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, technical snags, unauthorized access to computer data and storage device, technical snags and breach of security and encryption.

### **13. GOVERNING LAW AND DISPUTE RESOLUTION**

This Policy shall be governed by and construed in accordance with the laws of India and subject to the provisions of arbitration set out herein, the courts at Delhi shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.

If any dispute arises between Us and the User in connection with or arising out of the validity, interpretation, implementation or alleged breach of any provision of the Policy, such dispute shall be referred to and finally resolved by arbitration in accordance with the Indian Arbitration and Conciliation Act, 1996 for the time being in force, which rules are deemed to be incorporated by reference in this clause.

There shall be one (1) arbitrator and the seat of the arbitration shall be Delhi, India.

The language of the arbitration proceedings and of all written decisions and correspondence relating to the arbitration shall be English.

### **14. FOREIGN JURISDICTION**

The Company makes no representation that the content contained on the Platform is appropriate or to be used or accessed outside of India. If the Users use or access the Platform from outside India, they do so at their own risk and are responsible for compliance with the laws of such jurisdiction.

### **15. CONTACT US**

Please Contact Us (through "contact us" link) regarding any questions regarding (i) this Privacy Policy; (ii) practices of this Platform, or (iii) Your dealings with this Platform.

### **16. DETAILS OF RIVIERA GRIEVANCE REDRESSAL OFFICER**

In accordance with the Information Technology Act, 2000 and the rules made thereunder, the name and contact details of the Grievance Redressal Officer are provided below. You may contact the Grievance Redressal Officer to address any discrepancies and grievances you may have with respect to your Information with Riviera Investors (P) Ltd. The Grievance Officer will redress your grievances expeditiously

Officer-in-Charge,

Name: Ms. Priyanka Singh

Designation: Associate Director, Operations, Indifi Technologies Private Limited

Email id: [priyanka.singh@indifi.com](mailto:priyanka.singh@indifi.com)

**17. DISCLAIMER**

We make no warranties or representations about the accuracy or completeness of this Platform and contents hereof. We nor any of Our contractors, partners or employees shall be liable for any direct, incidental, consequential, indirect or punitive damages arising out of access to or use of any content of this Platform.

We communicate information provided and created by content partners, software developers, publishers, marketing agents, employees, users, resellers, advertisers and other third parties. While every attempt has been made to ascertain the authenticity and validity of the content on the Platforms, We have no control over content, the accuracy of such content, integrity or quality of such content and the information on Our pages, and material on the Platforms may include technical inaccuracies or typographical errors, and We make no guarantees, nor can We be responsible for any such information, including its authenticity, currency, content, quality, copyright compliance or legality, or any other intellectual property rights compliance, or any resulting loss or damage. FURTHER, WE ARE NOT LIABLE FOR ANY KIND OF DAMAGES, LOSSES OR ACTION ARISING DIRECTLY OR INDIRECTLY DUE TO ANY CONTENT, INCLUDING ANY ERRORS OR OMISSIONS IN ANY CONTENT, ACCESS AND/OR USE OF THE CONTENT ON THE PLATFORMS OR ANY OF THEM INCLUDING BUT NOT LIMITED TO CONTENT BASED DECISIONS RESULTING IN LOSS OF DATA, REVENUE, PROFITS, PROPERTY, INFECTION BY VIRUSES, DISTRIBUTED DENIAL-OF-SERVICE ATTACK, OR OTHER TECHNOLOGICALLY HARMFUL MATERIAL THAT MAY INFECT YOUR COMPUTER EQUIPMENT, COMPUTER PROGRAMS, DATA OR OTHER PROPRIETARY MATERIAL DUE TO YOUR USE OF OUR PLATFORM OR TO YOUR DOWNLOADING OF ANY CONTENT ON IT, OR ON ANY WEBSITE LINKED TO IT, ETC.