## PRIVACY POLICY - OXIGEN WALLET

Oxigen Services India Pvt. Ltd. ("our", "us", "we", "Website", "OSIPL" or "Oxigen") is committed to respect privacy and choice of its customers and /or business associates while using our website and application. This Privacy Policy provides you with details about the manner in which your data is collected, stored & used by us. You are advised to read this Privacy Policy carefully. By visiting OSIPL'S website/applications you expressly give us consent to use & disclose your personal information in accordance with this Privacy Policy. If you do not agree to the terms of the policy, please do not use or access OSIPL's websites or mobile applications.

Note: Our privacy policy may change at any time without prior notification. To make sure that you are aware of any changes, kindly review the policy periodically. This Privacy Policy shall apply uniformly to OSIPL's desktop website & mobile applications.

# This policy will cover and apply to:

- a. Visitors to OSIPL web sites e.g. Oxigenwallet.com, myoxigen.com, oxigen.com, oxirail and oximall.com.
- b. Users of mobile applications
- c. Users of sms based transaction tools
- d. Users of services provided by OSIPL & it's partners.
- e.OSIPL's business associates e.g. Retailers of OSIPL's services and other third party Service Providers whose personal and sensitive data is required to be maintained in OSIPL's computer systems to enable it to perform duly authorized and legally contracted services to its business associates and third party service providers and visitors who access OSIPL's network and/or computing systems through third party white labeled web sites to avail of such services that the white labeled service providers are authorized to provide using OSIPL's networks, computers and applications (whether operated and managed by OSIPL's own staff and resources or by its duly authorized outsourced managed service provider).

#### General

OSIPL will not sell, share or rent your personal information to any 3rd party or use your email address/mobile number for unsolicited emails and/or SMS. Any emails and/or SMS sent by OSIPL will only be in connection with the provision of agreed services & products and this Privacy Policy.

Occasionally, we may reveal general statistical information about OSIPL & its users, such as number of visitors, number and type of services purchased, etc.

We reserve the right to communicate your personal information to any third

party that makes a legally-compliant request for its disclosure.

## **Information Collected**

# 1. Traffic Data Collected

We automatically track and collect the following categories of information when you visit our Website/ mobile application:

- a) IP addresses;
- b) Domain servers;
- c) Types of web browsers used to access the Website/ mobile application;
- d) Types of computers/devices accessing the Website/mobile application;
- e) Referring source which may have sent you to the Website/ mobile application; and
- f) Other information associated with the interaction of your browser and the Website/ mobile application (collectively "Traffic Data").

### 2. Information Collected from You

In order for you to access certain areas of the Website/ mobile application, we may require you to provide us with certain information ("Personal Information"). Personal Information includes the following information:

- a. Your full name, address, e-mail address, telephone number, date of birth and bank or payment card details and any proof of your identity and/or address that we may request;
- b. Details of any transactions that you carry out through our Website or application using your Oxigen account and of the fulfillment of your requests:
- c. Details of any credit, debit or other card used by you for transactions;
- d. Details of any bank account (including but not limited to, account holder, account name, account number, sort code, 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:
- e. Any correspondence sent by you to us;
- f. Surveys that you complete through the Website or based on our request;
- g. Your participation in any promotion sponsored by us;
- h. Calls that we make to you or you make to us;
- i. Information collected through cookies.
- j. Your IP address, log-in times, operating system and browser type;
  and
- k. Details of your visits to our Website/ mobile application including, but not limited to, Traffic Data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access whilst visiting our Website/ mobile application.

# **Use and Storage of Information**

- 1. We use your Information for the following purposes:
  - a)To carry out your instructions to make and receive payments and undertake transactions using our services, including verifying that you have sufficient funds in your Oxigen wallet to make such payments;
  - b)To operate and administer your Oxigen account and to provide services that you have requested;
  - c) To notify you about changes to our service(s);
  - d) To comply with financial services regulations including retention of financial information and transactions;
  - e) For customer service, including answering questions and responding to feedback and complaints;
  - f) To provide you with information, products or services that you request from us or which we feel may interest you.
  - g)To allow you to participate in interactive features of the Website/ mobile application;
  - h)To improve our internal customer training,
  - i) For financial and identity checks, fraud prevention checks, antimoney laundering and credit checks;
  - j) To enhance the security of our services;

## 2. Retention of Data.

Oxigen is required under applicable laws to retain certain records for a period as suggested by regulatory after closure of your Oxigen account, which will include your personal data such as your name, contact details, customer number and transaction history, etc. ("Retained Data"). Other than the Retained Data, we will delete and destroy all Personal Information that we hold about you when you (or we) terminate your Oxigen account. We do not store your online banking login PIN, TAN and/or password. Please note that we will not store your credit card information.

3. Please note that we will never ask you to disclose your personal or security details by e-mail. If you receive any e-mail purportedly from Oxigen requesting your personal or security details, please do not respond to it ("Such E-mail"). Please forward any Such E-mail to <a href="mailto:care@oxigenwallet.com">care@oxigenwallet.com</a> and thereafter delete the e-mail immediately.

## **Consequences of not providing Personal Information**

If you choose not to provide your Personal Information that is mandatory to process your request, Oxigen may not be able to provide the corresponding service.

## Disclosure of Data / Information:

1. OSIPL will not share any personal or sensitive data with any external organization unless the same is necessary to enable OSIPL to provide services (to customers or business associates) or to enable completion of a legitimate transaction or for reporting which may be necessary or required pursuant to applicable law or pursuant to the

- terms and conditions applicable to such information as agreed to with OSIPL.
- 2. OSIPL may disclose information about customers and / or business associates as permitted or required by law.

<u>Data recipients, transfer, and disclosure of Personal Information</u>

Oxigen does not share your Personal Information with third parties for marketing purposes without seeking your prior permission. Oxigen will seek your consent prior to using or sharing Personal Information for any purpose beyond the requirement for which it was originally collected. We may share your Personal Information within Oxigen or with any of its subsidiaries, business partners, service vendors, authorized third-party agents, or contractors located in any part of the world for the purposes of data processing, storage, loyalty redemptions, reward point led programs or to provide a requested service or transaction, after ensuring that such entities are contractually bound by data privacy obligations. When required, Oxigen may disclose Personal Information to external law enforcement bodies or regulatory authorities, in order to comply with legal obligations.

# Observation of reasonable security practices:

- 1. OSIPL shall take all precautions to maintain the confidentiality of personal and sensitive information / data pertaining to its customers and business associates by imparting proper training to its employees and by providing restricted access to persons who may require access to such data strictly on a need to know basis.
- 2. OSIPL follows formally laid down security policies and practices relating to data acquisition, usage, preservation, disclosure and destruction. The same are followed by it employees and employees of such outsourced organization that OSIPL may appoint to manage such data.

## **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. Oxigen uses cookie and tracking technology depending on the features offered. No personal information 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.

### **Links to Other Sites**

Our site links to other websites that may collect personally identifiable information about you. Oxigen is not responsible for the privacy practices or the content of those linked websites.

### Security

Oxigen has stringent security measures in place to protect the loss, misuse, and alteration of the information under our control. Whenever you change or access your account information, we offer the use of a secure server. Once your information is in our possession we adhere to strict security guidelines, protecting it against unauthorized access.

#### Consent

By using Oxigen and/or by providing your information, you consent to the collection and use of the information you disclose on Oxigen in accordance with this Privacy Policy, including but not limited to your consent for sharing your information as per this privacy policy.

# Updates to this privacy statement

Oxigen may change the data privacy practices and update this privacy statement as and when the need arises, and the same will be made available on the website. But our commitment to protect the privacy of website users will continue to remain.