

## Versura Shiksha Service Private Limited

### Privacy Policy

THIS PRIVACY POLICY (“**PRIVACY POLICY**”) SETS FORTH THE MANNER OF COLLECTION, USE AND DISCLOSURE OF INFORMATION GATHERED ON THE PLATFORM. PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY CONTINUING TO USE THE SERVICES, OR ACCESS THE VERSURA SHIKSHA SERVICE PRIVATE LIMITED PLATFORM YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO SAME, YOU MAY NOT ACCESS OR USE THE PLATFORM OR AVAIL THE SERVICES. Access and use of the Platform is subject to the Terms and Conditions (“**Terms**”) accessible on the Platform.

#### Introduction

Versura Shiksha Service Private Limited (Versura) with its registered office at G-26, G7 Mall, J. P. Road, Seven Bungalows, Opposite Versova Metro Station, Andheri (West), Mumbai – 400 061, operating under the brand name “**Versura**” (“**Company**”, “**Versura**” “**We**”, “**Us**”, “**Our**” and terms of similar meaning) owns and operates:

- a) <https://www.versurashiksha.com> including any subdomains thereof (collectively, “**Site**”);
- b) all related widgets, tools, applications, data, software, APIs, mobile, tablet and other smart device applications (collectively, “**Application**”); and
- c) Services/ Platform (*as defined herein below*).

The Site and the Application together are hereinafter collectively referred to as the “**Platform/Services**”

- (i) The Platform operated by the Company (i) enables You to avail affordable and secured/unsecured financial services such as loans, digital products etc from Lenders (i.e. non-banking financial institutions, banks and such other financial entities authorised to disburse loans in accordance with applicable laws, subject to the satisfaction of eligibility criteria and other conditions stipulated by the Lenders; and (ii) facilitates loan origination process, loan disbursement and collection process.
- (ii) Protection Solutions for School Management, Staff., Students, Property, Vehicles, etc.
- (iii) Advisory Services for Structured Financial Solutions
- (iv) Learning Management Solution for education institutes
- (v) Fee financing solutions

We at Versura are committed to protecting Your privacy and personal information, and this Privacy Policy outlines how Information (*as defined hereinafter*) will be collected, used, processed and shared in connection with access by users, applicants, visitors and viewers (hereinafter referred to as “**You**”, “**Your**”, “**User**” as applicable) of Our Platform. By accessing and using the Platform, You consent to the use of Your Information in accordance with this Privacy Policy. We will not share any User Information with any third party without Your consent, except as outlined in this Privacy Policy or as permitted by law. The collection, usage, and sharing of User information by Us shall be in compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and other applicable laws, as amended from time to time.

As We update, improve and expand the Platform and with technology and legal changes, this Privacy Policy may change, so please refer back to it periodically as You will be deemed to have accepted and be governed by the terms of such modified Privacy Policy, as it comes into effect from time to time. If We make a significant or material change in the way We use or share Your Personal Information (*as defined hereinafter*), You will be notified via email and/or provided notice vide the Platform, within a reasonable time.

#### COLLECTION OF INFORMATION

To access/use the Platform, You may be asked to provide certain personal, non-personal and other information or data, as indicated below (such information and correspondences hereinafter collectively referred to as “**Information**”):

1. In order for You to access the Platform, We may require You to provide Personal Information. Personal Information means information about any individual, or information from which any individual is directly or

indirectly identifiable. Personal Information may be freely provided by You, or, in case of usage data, collected automatically when using the Services such as when You sign in through third party sites (*as maybe applicable*). Details on each type of Personal Information collected are provided here under or by specific explanation texts, displayed prior to such Personal Information collection.

2. "Personal Information" includes the following categories of information:
  - (i) Contact Data (such as Your e-mail address, phone number and account details and password);
  - (ii) Demographic Data (such as Your gender, Your date of birth, nationality, PIN code);
  - (iii) Financial information (such as PAN card, bank documents, bank details, salary slips, bank statements, data from credit information companies, data required for Know Your Customer (KYC) compliances); and
  - (iv) Details of consents (records of consents given for collection of information with the date and time and other relevant information).

Please note that the above list is not an exhaustive list and is only an illustrative list.

Through some features on Our Platform, You may opt to provide Us Information about yourself if You are interested (a) in availing Our Services as a partner, employer or as an applicant; or (b) in an employment opportunity at Versura; or (c) through the 'Contact us' page; or (d) any other manner. The information requested from You will be based on Your area of interest.

You are responsible for any third-party Personal Information obtained, published, or shared through the use of the Platform and confirm that You have the third party's consent to provide such Information to Us.

1. Non-Personal Information: When accessing the Platform, We may collect certain non-personal information such as Your internet protocol address, operating system, browser type and internet service provider. This type of information does not identify You personally.

2. Automatic Information: To improve the responsiveness of the Platform for You, We may use "cookies", or similar electronic tools to collect information to understand Your individual interests. A cookie is a small text file that is stored on Your computer that enables Us to recognize You when You visit Our Platform, 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 Platform, and assist with security and administrative functions. These server logs may include information such as Your web request, Internet Protocol address, browser type, browser language, the date and time of Your request, Your visits to, and interaction and engagement with, the Platform, content and ads on third party websites, applications, platforms and other media channels, log files, web and one or more cookies that may uniquely identify Your browser. By using Our Platform, You signify Your consent to Our use of cookies.

3. These terms seek to cover any personal / sensitive personal information of the User provided to Versura online or offline, as also any information that may be collected by Versura server from the User's browser, mobile app or mobile device and/or its nominees, including any information, which may or may not be personally identifiable and/or traffic information and/or any information which may be collected by Versura, its dealers, agents/agencies, including our server from the User's browser mobile app or mobile device

4. User communications: When You send emails or other communications to Us, We may retain those communications in order to process Your inquiries, respond to Your requests and improve our Platform/Services.

We endeavour to provide You with choices regarding the Personal Information You provide to Us. You can set Your browser or mobile device to refuse all or some browser cookies, or to alert You when cookies are being sent. If You disable or refuse cookies, or choose to decline to submit any Information, We may not be able to provide You access to the Platform or use certain aspects of the Platform. We will not be liable and/or responsible for the denial of providing access to the Platform to You on account of inadequacy of Information provided by You.

**Children:** Versura does not knowingly collect any Personal Information from children under the age of 18. If You are under the age of 18, please do not submit any Personal Information through our Platform. Though we have placed appropriate mechanisms, we encourage parents and legal guardians to monitor their children's internet usage and to ensure no Personal Information is provided through our Service(s). If You have reason to believe that a child under the age of 18 has provided Personal Information to Us through the Platform, please contact Us and We will endeavour to delete that information and terminate the child's account from Our databases.

## Security

We value your trust in providing us your Personal Information, thus we continuously strive to use commercially acceptable means of protecting it. But, remember that no method of transmission, whether in physical form or over the internet, or method of electronic storage is 100% secure and may be subjected to unintentional risks, due to reasons beyond our control.

### **Links to Other Sites**

Our website and mobile apps may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that such external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Terms of such external websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

### **Responsibility of User**

User acknowledges the following:

(a) Versura and/or its employees/personnel/Assigns will not contact the User directly for disclosure of any sensitive and personal information unless required for the Purpose. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting you before disclosing any personal and sensitive personal data / information by reaching out to BFL's nearest branch or BFL's official customer care number accessible on its website before deciding to make any disclosure.

(b) User shall not hold Versura to be liable / responsible for any breach of privacy owing to your negligence and hereby waive off from making any claims / demands / compensation against Versura.

(c) User shall only use the official website/links of Versura for availing products/services by inputting the domain information on the address bar.

(d) User is completely aware about the potential risk of data/privacy breach and User hereby confirms that User shall be solely liable for any unauthorized disclosure/breach personal/sensitive personal information, etc and any direct/indirect losses suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal data/sensitive personal data (including but not limited to any passwords, financial information, account details, etc) are NOT shared/stored/made accessible through:

i) any physical means with or without User's knowledge (disclosure to any person/third party; etc) or

ii) through any electronic means, by exercising the following precautions/safety measures:

(1) User shall always check if "https" appears in any website's address bar before making any online transaction, to ensure that the webpage is encrypted;

(2) User shall avoid using third party extensions, plug-ins or add-ons on the/your web browser, as it may result in the risk of tracking or stealing of my personal details;

(3) User shall always type the information and not use the auto-fill option on web browser and mobile apps to prevent the risk of storage of my personal/sensitive personal information;

(4) User shall NOT access darknet, unauthorized/suspicious websites, suspicious online platforms, downloading applications from unreliable sources

(5) User shall ensure to disable cookies before accessing any domain/website, to ensure that User's personal information is not tracked by any third party, unless otherwise consciously permitted by User by accepting the same, for which, User alone will be responsible for the consequences thereof

(6) User shall NOT respond to any generic emails from an unknown/unidentified source;

(7) User shall check the Privacy Policy of the website/application to know the type of information that may be collected from User and the manner in which it may be processed by the website/application before accepting/proceeding/transaction on any website/application;

(8) User shall always verify and install authentic web/mobile applications from reliable source on User's computer/laptop/tab/iPad/smart phone or any other electronic device;

(9) User shall NOT access any unidentified weblinks, bitly link or any other electronic links shared over electronic platform (such as email, SMS, social media, websites);

### **BUSINESS PARTNERS and THIRD-PARTY VENDORS:**

We may also share certain filtered Personal Information to our corporate affiliates or business partners who may contact the customers to offer certain products or services, which may include free or paid products / services, which will enable the customer to have better customer experience . Examples of such partners are entities offering co-branded credit cards, travel insurance, insurance cover against loss of wallet, banking cards or similar sensitive information etc. If you choose to avail any such services offered by our business partners, the services so availed will be governed by the privacy policy of the respective service provider.

Versura may share your Personal Information to third party that Versura may engage to perform certain tasks on its behalf, including but not limited to payment processing, data hosting, and data processing platforms.

We use non-identifiable Personal Information of Users in aggregate or anonymized form to build higher quality, more useful online services by performing statistical analysis of the collective characteristics and behaviour of our customers and visitors, and by measuring demographics and interests regarding specific areas of the Website. We may provide anonymous statistical information based on this data to suppliers, advertisers, affiliates and other current and potential business partners. We may also use such aggregate data to inform these third parties as to the number of people who have seen and clicked on links to their websites. Any Personal Information which we collect and which we may use in an aggregated format is our property. We may use it, in our sole discretion and without any compensation to you, for any legitimate purpose including without limitation the commercial sale thereof to third parties.

Occasionally, Versura or its partners will hire a third party for market research, surveys etc. and will provide information to these third parties specifically for use in connection with these projects. The information (including aggregate cookie and tracking information) we provide to such third parties, alliance partners, or vendors are protected by confidentiality agreements and such information is to be used solely for completing the specific project, and in compliance with the applicable regulations.

## **DISCLOSURE OF INFORMATION**

In addition to the circumstances described above, Versura may disclose User's Personal Information if required to do so:

- by law, required by any enforcement authority for investigation, by court order or in reference to any legal process;
- to conduct our business;
- for regulatory, internal compliance and audit exercise(s)
- to secure our systems; or
- to enforce or protect our rights or properties of Versura or any or all of its affiliates, associates, employees, directors or officers or when we have reason to believe that disclosing Personal Information of User(s) is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

Such disclosure and storage may take place without your knowledge. In that case, we shall not be liable to you or any third party for any damages howsoever arising from such disclosure and storage.

## **USER GENERATED CONTENT**

Versura provides an option to its users to post their experiences by way of reviews, rating and general poll questions. The customers also have an option of posting questions w.r.t a service offered by Versura or post answers to questions raised by other users. Though the participation in the feedback process is purely optional, you may still receive emails, notifications (app, SMS, WhatsApp or any other messaging service) for you to share your review(s), answer questions posted by other users or a. The reviews may be written or in a video format. The reviews written or posted may also be visible on other travel or travel related platforms.

The UGC that Versura collects may be of the following kinds:

- Review and Ratings
- Question and Answers
- Crowd Source Data Collection (poll questions).

## HOW WE USE YOUR INFORMATION

We may use the Information We collect from You and about You in any one or more of the following manners:

1. To create a user account for use of Platform;
2. To verify Your registration/application details including email address or phone number;
3. To undertake due diligence of applicant and seek mandatory information required for the purposes of KYC;
4. To share Personal Information as may be necessary for a Lender to process an application for any loan/credit facilities requested by You;
5. To process, fulfil Your request for Services and provide Services;
6. To perform actions as may be required by a Lender including sending any payment reminders in the frequency and manner as required by the Lender;
7. To improve our Platform, provide You with superior Services and a range of offers;
8. To diagnose technical problems, provide customer support;
9. To contact You including to send You communications that You have requested or that may be of interest to You by way of emails, or courier, or registered post, or telephone calls, or any other mode of communication;
10. Generate and review reports and data about, and to conduct research on, Our user base and Service usage patterns;
11. Provide You with policies governing Your account;
12. Notify You about changes to Our Platform;
13. Allow You to participate in interactive features offered through Our Platform;
14. In any other way We may describe when You provide the Information;
15. To avoid fraud and other prohibited or illegal activities;
16. We may use and disclose Information, in good faith, wherein the access, use, preservation or disclosure of such information is reasonably necessary to (i) satisfy (*which may be without notice to You*) any applicable law, regulation, legal process or enforceable governmental request, (ii) enforce this Privacy Policy, including investigation of potential violations thereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, or (iv) protect against imminent harm to the rights, property or safety of the Company, its users or the public as required or permitted by law;
17. For any other purpose with Your express consent.

## SHARING OF INFORMATION

For the purposes of Our Platform, We shall be sharing Your Personal Information with any of Our business partners (*including Lenders*), administrators, vendors, agents, service providers or affiliates for legitimate business purposes (including operating the Services, and providing Services to You), in accordance with applicable law. For example, companies We have hired to assist in protecting and securing our systems and services may also need access to Personal Information to provide those functions.

However, We do not sell, trade, or otherwise transfer Your Personal Information to outside parties other than for the purpose it is collected for except in the following ways:

1. legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation, for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security;
2. outside professional advisors (such as accountants, auditors, or lawyers), subject to binding contractual obligations of confidentiality;
3. any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights;
4. If You interact with social media features on Our Platform or use Your social media credentials to log-in or post content (*as maybe applicable*), these features may collect information about Your use of the Platform, as well as post information about Your activities on the social media service. Your interactions with social media companies are governed by their privacy policies;
5. Collective information such as demographics and website usage statistics with Our sponsors, advertisers or other third parties whose practices are not covered by this Privacy Policy. When this type of information is shared, such parties do not have access to your Personal Information.
6. Transfer of sensitive personal information under a contract subject to maintaining the same level of data protection; and

7. Additionally, in the event of an audit, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Our business, assets or stock (*including in connection with any bankruptcy or similar proceedings*), We may share/transfer/assign the Information We have collected to the relevant third party, subject to such party maintaining the same level of data protection.

## **SECURITY OF INFORMATION**

We use reasonable security measures to protect Information from unauthorized access, maintain data accuracy and help ensure the appropriate use/disclosure of Information. These safeguards take into account the sensitivity of the information that We collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the Personal Information submitted to Us, both during transmission and once We receive it. We host the Platform in a secure server environment that uses firewalls and other advanced technology to prevent interference or access from outside intruders and Our email services have the most advanced security infrastructures. It protects Personal Information with multiple layers of security, including leading encryption technology like HTTPS and Secure Sockets Layer. Although We provide appropriate firewalls and protections, We cannot warrant the security of any Personal Information transmitted as Our systems are not hack proof. Information pilferage due to unauthorized hacking, virus attacks, technical issues is possible and We take no liabilities or responsibilities for it.

Further, please note that You are responsible for maintaining the security and confidentiality of Your account, user ids and passwords or any other Personal Information while accessing the Services. If We receive instructions using Your user name and password, We will consider that You have authorized the instructions.

Once your information is in our possession we adhere to strict security guidelines, protecting it against unauthorized access.

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **PROCESSING OF INFORMATION**

As outlined in this Privacy Policy, Versura will not process Your Personal Information without a lawful basis to do so. In general, Versura may process Your Personal Information on the legal basis of: (i) consent (where We have obtained Your prior, express consent to the processing);(ii) contract (if You have entered into an agreement with Us and/or Lenders and such processing is a necessary part thereof); (iii) compliance with applicable laws; (iv) to protect the vital interests of any individual. Versura may also process certain Personal Information on the basis of the following legitimate interests, provided that such interests are not overridden by Your privacy rights and interests: (i) delivering and continuing to develop and improve the Services, (ii) learning from Your behaviour on Our Platform to better serve You and other users, helping Us modify or enhance the Services and its content, (iii) receiving insight as to what users like or dislike about our Services or aspects thereof, and (iv) providing a consistent and secure user experience in connection with the Services.

### **Android and iOS permissions:**

**Device & App history:** We need your device permission to get information about your device, like OS (operating system) name, OS version, mobile network, hardware model, unique device identifier, preferred language, etc. Basis these inputs, we intend to optimize your travel booking experience, use OS specific capabilities to drive great in-funnel experiences using components of device's OS, etc.

**Identity:** This permission enables us to know about details of your account(s) on your mobile device. We use this info to auto-fill your email ID's and provide a typing free in-funnel experience. It helps us map email ID's to a particular user to give you the benefit of exclusive travel offers, wallet cash-backs, etc. It also allows facilitating your Facebook and Google+ login.

**Location:** This permission enables us to give you the benefit of location specific deals and provide you a personalized in-funnel experience. When you launch Versura app we auto-detect your location so that your nearest airport or city is auto-filled.

**SMS:** If you allow us to access your SMS, we read your SMS to autofill or prepopulate 'OTP' while making a transaction and to validate your mobile number. This provides you a seamless purchase experience while making a booking and you don't need to move out of the app to read the SMS and then enter it in the app.

**Phone:** The app requires access to make phone calls so that you can make phone calls to Versura or its appointed/designated vendors our customer contact centers directly through the app.

**Wi-Fi connection information:** When you allow us the permission to detect your Wi-Fi connection, we optimize your experience such as more detailing on maps, better image loading, etc.

## **ACCESS AND DELETION OF INFORMATION**

When You sign up for Platform, You are opting in to receive emails from Versura. We will take reasonable steps to accurately record the Personal Information that You provide to Us and any subsequent updates. As a User, You have the right to access, correct, delete, or transfer Your Personal Information that We hold, including registration/application details. You also have the right to withdraw any consents that have been previously granted, however, You may not be able to access the Platform or avail the Services in such instances.

## **INDEMNIFICATION**

You agree to indemnify Us, Our subsidiaries, affiliates, officers, agents, partners, and employees and hold Us harmless from and against any claims and demand, including reasonable attorneys' fees, made by any third party arising out of or relating to: (i) Personal Information and contents that You submit or share through the Platform; (ii) Your violation of this Privacy Policy, or (iii) Your violation of rights of other person(s).

## **CHANGES TO THIS POLICY**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us: [info@versurashiksha.com](mailto:info@versurashiksha.com)

## **Declaration:**

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. VSSPL will take all steps reasonably necessary to ensure that your data is treated securely.