

# FxPay Privacy Policy

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# 1. Introduction

FxPay Service India Private Limited hereby referred to as “FxPay”, “We”, “us”, “our” is a customer centric company providing seamless operations experience to a host of digital media players - advertisers, influencers, content creators, digital agencies enabling them to grow, outperform and scale on multiple social media platforms

FxPay has formulated this “ FxPay Privacy Policy” hereby also referred to as “Privacy Policy”.

Your data and your privacy is important to us. We at FxPay are committed to ensure that the processing of the personal data is done in a fair, responsible and diligent manner.

This “Privacy Policy” details the privacy practices of FxPay and describes the rights and choices available to individuals and businesses with respect to their information.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

## 2. What Personal Information do we collect?

FxPay collects information from you, through our interactions with you and through over services. Some of this data is directly provided by you and some of it is collected about your interactions, use and experiences with our services. The information we collect depends on the context of your interactions with us, how you use our services, the choices you make, including your privacy settings.

Based on your interactions with us, the information collected may include your contact information, business details, identity data, social media profile and other information associated with your business or your company and as relevant or applicable to the services that you are engaging us with.

- **Contact Information**, such as your first and last name, father or spouse name, residential address, mobile number, email address

- **Business details**, such as nature of your business, company details, tax information, etc
- **Identity data** such as your Aadhar or equivalent, PAN or tax identification number, GST details
- **Social media profile** about you such as website address, social media accounts of your business if applicable and any content, text and images, along with the metadata associated with the files you upload.
- **Cookies and other information collected by automated means**

We use cookies to automatically identify you when you use our website which may include information about your computer or mobile device and the related activity happening on your device. The information includes details about the device, operating system, browser type, IP address, screen resolution, browsing history limited to the website you visited before, location details which may include city, state or geographic area. Additionally, information about your navigation behavior in terms of number of pages or screens you have visited, time spent on each of these pages, navigation paths taken between pages or screens and other related navigational attributes

As always, you have rights and choices when it comes to sharing your information with us. When we ask you to provide personal data, you can decline. Many of our services require some personal data to provide you with the desired service. If you choose not to provide data required to serve you through our service offering, you cannot be able to leverage our service offering. Likewise, where we need to collect personal data by law or to enter into or carry out a contract with you, and you do not provide the requisite data, we will not be able to enter into the contract; or if this relates to an existing product you're using, we may have to suspend or cancel it. We will notify you if this is the case at the time.

## 3. How do we use or process your personal data?

### 3.1 Service Delivery

FxPay uses your personal information to:

- Verify your identity
- Provide seamless customer experience to you
- Communicate with you regarding updates about the the progress of your offered services which may include announcements, updates, security alerts and other relevant information
- To be able to respond to your questions, queries and feedback and to help us provide the best personalized service

### 3.2 Legal compliance

To ensure compliance with the applicable laws, We process your personal information

- In the interests of prevention, detection, investigation and prosecution of any offense or any other contravention of law unless it is authorized by a law made by Parliament and State Legislature or any other law making body and is necessary for, and proportionate to, such interests being achieved.
- Respond to requests from judicial, governmental authorities which are necessary for enforcing any legal right or claim seeking any relief, defending any charge, opposing any claim, or obtaining any legal advice from an advocate in any impending legal proceeding or by any Court or Tribunal in India which is necessary for the exercise of any judicial function

### 3.3 Research and Development

With an objective of providing high quality customer service, FxPay collects information regarding your usage for internal analysis which can include study of user demographics usage of service

### 3.5 Anonymisation of Data

FxPay may transform or convert your personal data to a form in which you cannot be identified. Anonymisation ensures that the de-identified data is achieved by removing information that would reasonably identify, relate to, describe, be capable of being associated with or be linked directly or indirectly to you.

Such transformed anonymised data may be used and shared with third parties for our legitimate business purposes including to analyze and improve our Services and to promote our business.

### 3.6 Any other purpose

We may also use your personal for purposes described in this Privacy Policy document or at the time we collect information

### 3.7 Your consent

Your Personal data may be processed on the basis of your consent given no later than at the commencement of the processing and in some scenarios, specific consent shall be sought from you for collecting, using or sharing your personal information, such as when required by court of law

## 4. Providing your personal data to others

Your personal information will not be shared with third parties without your consent, except in the following circumstances:

### 4.1 Our Associated Social Media Platforms

As the social media platforms are the basis and the placeholder of all your interactions, conversations, We may share your personal information with social media platforms who help us facilitate in providing services to you. It is to be noted that these third parties may use your personal information only as directed or authorized by us and in a manner in consistent with the this Privacy Policy and are otherwise prohibited from using or disclosing in any manner for any other purpose

#### 4.2 Professional Advisors

We may disclose your personal information to our professional advisers such as bankers, lawyers, auditors, insurers in so far as reasonably necessary for the purposes of understanding, reviewing, processing your information for the express purpose of providing the desired services

#### 4.3 Partners and Affiliates

We may share your personal information with our corporate parent company, affiliates, strategic partners, for purposes consistent with this Policy

#### 4.4 Business transfers

In connection with a business transaction or potential business transaction like corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution, we may sell transfer or otherwise share some or all of our business or assets,including your personal information

#### 4.4 Legal Compliance, fraud prevention and safety

In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.



## 5. International Transfer of your personal data

### 5.1 Location of offices

FxPay India is headquartered in India and our affiliated partners, associated social media platforms are in other countries and your personal information may be transferred to other locations outside of India.

### 5.2 Hosting facilities

The hosting facilities for our website are situated on "Cloud" [AWS]. Transfers to any of the countries of our partners will be protected by appropriate safeguards, namely the use of standard data protection clauses as applicable. It is to be noted that at least one serving copy of personal data shall be stored on a server or a data center located in India

### 5.3 Your acknowledgement

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others. .

## 6. Retaining and deleting your personal data

This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.2 We will retain your personal data as follows:

6.2.1. Your personal data will be retained on the cloud as we don't keep any data on our physical servers.

6.3 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person

## 7. How do we secure your personal data?

### 7.1 Appropriate Safeguards

We will take appropriate technical and organizational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

### 7.2 Secure Platforms

We will store all your personal data on secure cloud platforms. Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

### 7.3 Transmission over internet

You acknowledge that the transmission of unencrypted or inadequately encrypted data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## 8. Your rights

We value your privacy and we respect your rights. Our respect stems from our commitment to all the Globally Accepted Data Protection Rules and Regulations which include GDPR, CCPA, India Data Protection Bill and other laws.

In this section, we have summarized the rights that you have under the various data protection laws. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

### 8.1 Right to be informed

You have the right to be informed the identity and the contact details of the controller, processor and, where applicable, of the controller's representative; the contact details of the data protection officer, where applicable; the purposes of the processing for which the personal data are intended as well as the legal basis for the processing; where applicable, the fact that the controller or processor intends to transfer personal data to a third country

### 8.2 Right to confirmation and access

You have the right to confirm as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

### 8.3 Right to correction or rectification

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

## 8.4 Right to object

8.4.1 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.4.2 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

8.4.3 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

8.4.4 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the

performance of a task carried out for reasons of public interest.

8.4.5 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection

8.4.6 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

## 8.5 Right to erasure or right to be forgotten

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

## 8.6 Right to data portability

You have the right to receive the following personal data related to you in a structured, commonly used and machine-readable format—

- Which has provided by you or
- Which has been generated in the course of provision of services by us or
- Which forms part of any profile generated by us for your application,

However this right shall only apply where the processing has been carried out through automated means, and shall not apply where— (a) processing is necessary for functions of the State or Government (b) processing is in compliance with law or

any order of any court or tribunal. Or (c) compliance with the request which would reveal our partners' trade secrets would not be technically feasible.

#### 8.7 Right in relation to automated decision making and profiling

You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or her or similarly significantly affects you

## 9. Other third party sites, applications and services

Our service may contain links to other websites or hyperlinks and details of third party websites or applications and other online services operated by third parties and additionally our content may be included on web pages or in applications or other online services that are not associated with us. We have no control over and are not responsible for the privacy practices and policies of the third parties. However, we strongly encourage you to peruse the privacy policies of the other websites, applications and online services before use.

## 10. Children and Minors

Children and Minors under the age of 18 years at the time of data collection are not permitted to use this service. We do not knowingly collect personal information of children and minors under the age of 18 years. If accidentally and unknowingly we had collected information of children and minors, we will immediately delete such information. In case you believe that information pertaining to children has been collected by us, please contact us as described in section 11.

## 11. How do you contact us?

This website is owned and operated by FxPay Service India Private Limited. For address details please visit us at <https://www.fxpayervices.com/>

Our principal place of business in India is at:

FxPay Service India Private Limited

16-3-1112, IDPL Workers Housing Society, Bhagat Singh Nagar Phase 2, Kukatpally  
Hyderabad Hyderabad Telangana - 500085 India

You can contact us:

- a. By mail at the addresses listed at <https://www.FxPay.com/contact/>  
or
- b. By telephone, on the contact number published on our website from time to time; or
- c. By email, using the email address published on our website from time to time.

You can also reach to the

Data Protection Officer - Mr Pinaki Datta; Email id: [pinaki@fxpayervices.com](mailto:pinaki@fxpayervices.com)

## 12. Changes to the policy

We reserve the right to make changes or modify the policy at any time. In case of any significant or material changes to this policy, a notification will be posted on our service with the updated effective date of this Privacy Policy. And any modifications and changes to this Privacy Policy will be effective upon our posting the new terms and your previous consent shall be presumed to be effective and your continued use of the Service after the posting of the revised policy indicates your acceptance of the terms of the modified Policy