

Alpha Alternatives Financial Services Private Limited
(Formerly Known as Provincial Finance and Leasing Co Private Limited)

Privacy Policy

Version 3.0
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Applicable to: Alpha Alternatives Financial Services Private Limited (“AAFSPL”)
(Formerly Known as Provincial Finance and Leasing Co Private Limited (“PFLCPL”))

Applicability:

Alpha Alternatives Financial Services Private Limited (“AAFSPL”) (Formerly Known as Provincial Finance and Leasing Co Private Limited) is strongly committed to protecting the customer privacy and keeping the customer information safe and secure. Your visit to this Website is subject to this privacy, security and cookies policy (“**Privacy Policy**”) and other terms and conditions available here in this Website. In addition, you can look forward to receiving exclusive promotions offering special deals. We have provided this Privacy Policy, which sets forth our policies regarding the collection, use and protection of the personal information of those using the Website. “Personal information” means information that can be linked to a specific individual, such as name, address, telephone number, e-mail address, and credit/debit card number. We encourage the customer to review our Privacy Policy, become familiar with it and understand how any Personal Information you provide to us will be handled. However, the customer should know that we do not sell or rent our customers’ Personal Information to third parties. If you use the Website, you will be regarded as having read and accepted this Privacy Policy, and you expressly consent to our use and disclosure of your Personal Information in accordance with this Privacy Policy.

This document is published and shall be construed in accordance with the provisions of the Information Technology Act, 2000 read with Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data of Information) Rules, 2011 under the Information Technology Act, 2000; that require publishing of the Privacy Policy for collection, use, storage and transfer of sensitive personal data or information.

The **Company** is committed to ensuring that your privacy is protected. This Privacy Policy explains our policies and practices regarding the collection, use, and disclosure of information about you. That’s why we insist upon the highest standards for secure transactions and user information privacy. Please read the following statement to learn about our information gathering and dissemination practices.

2 Privacy Policy Coverage

This Privacy Policy describes how we collect information from you, how we protect it and how we use it, and share all Personal Information which you provide when you use the Website. This Privacy Policy does not extend to the practices of companies that the Company does not own or control or to people that the Company does not employ or manage.

We know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. We take reasonable measures to protect the confidentiality of your information and its transmission through the world wide web and the Company shall not be held liable for disclosure of the Personal Information when in accordance with this Privacy Policy.

2 Collection of Information

We collect and store information including Personal Information, that the customer voluntarily provides either while on the Website or in response to emails in relation to features and services provided on the Website. A few examples of what we collect and store includes: (i) name, email address and demographic information that the customer provides when the customer enrolls or takes part in Website activities and information provided in search requests or questions that the customer submit to the Website. The customer can visit our Website without revealing the customer’s identity or any personal information, but the customer may be unable to access certain options, offers and services. We track the internet address of the domains from which people visit us and analyse this data for trends and statistics, but the individual user remains anonymous. [Your information will primarily be stored in electronic form however certain data can also be stored in physical form. We may enter into agreements with third parties (in or outside of India) to store or process your information or data. These third parties may have their own security standards to safeguard your information or data and we will on a commercial reasonable basis require from such third parties to adopt reasonable security standards to safeguard your information/data.]

The information we collect, which may include your Personal Information, may be used for the following purposes as well:

- ☐ To provide our services
- ☐ To identify and authenticate your access to certain features of the Website;
- ☐ To communicate with you and to keep you informed of our latest updates;
- ☐ To serve you advertisements when you use our Website;
- ☐ To perform a research or to conduct anonymous analytics in order to improve and customize our services to your needs and interests;
- ☐ To test changes to the services and Website, and make improvements to their functionality;
- ☐ To support and troubleshoot our services and to respond to your queries;

For better management of the Website, we may (i) log the customer's browsing history, (ii) log non- personally-identifiable information, including IP address, profile information, aggregate user data, and browser type, and (iii) record User IP addresses for security and monitoring purposes.

☐ **Representations to the Company**

You hereby represent to the Company that

- i. the information you provide to the Company from time to time is and shall be authentic, correct, current and updated and you have all the rights, permissions and consents as may be required to provide such information to the Company.
- ii. Your providing the information to Company's consequent storage, collection, usage, transfer, access or processing of the same shall not be in violation of any third party agreement, laws, charter documents, judgments, orders and decrees.

• **Authorisation from customers/users**

We do not share your Personal Information with third-parties except as set out in this Privacy Policy.

You hereby authorise and permit the Company to disclose, from time to time, any information on or relating to you, to any of its subsidiaries or affiliates or to any governmental authority, statutory authority, judicial authority, associated partners and subcontractors, whether in India or any other jurisdiction, or any other third party or the Company's consultants, advisors or service providers or commercial partners, as provided in the Company's Privacy Policy, without requirement for any further consent from you at any point of time.

• **Acceptance of this Privacy Policy**

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

• **Information Sharing and Disclosure**

The **Company** will not disclose Personal Information about you to third parties except in the following situations:

- i. We have your consent to share the information;
- ii. We need to share your information to provide the product or service you have requested;

iii. We need to share the information with certain service partners in order to respond to your comments or to resolve service issues. (Unless we tell you differently, these partners have no independent right to use this information except to respond to your comments or to resolve the service issues);

iv. We respond to requests from any Indian or foreign government, security, defence, revenue, regulatory or other authority, agency or officer, and/or to comply with any applicable law, regulation, legal process or governmental request;

v. We find that your actions on our Website violate the Company's terms of service or any of our usage guidelines for specific products or services;

vi. We need to investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;

vii. We need to establish or exercise our rights to defend against legal claims;

viii. If we use third party processors to administer and process your Personal Information for the purposes notified in the Privacy Policy, e. g. for hosting activities related to the use of our Website or services; or

ix. We may need to share details with third parties (such as auditors or legal advisors) to obtain advice. Any such processing will be governed by an agreement in the form required by law, preserving any statutory data protection rights.]

- **Third party collection of information**

Please keep in mind that this Privacy Policy does not apply to any third party's websites, services or applications, even if they are accessible, downloadable, or otherwise distributed through the Website.

You should always review their privacy practices carefully before providing Personal Information to such third parties.

You are knowingly and voluntarily assuming all risks of using any third-party websites, services or applications. You agree that the Company shall have no liability whatsoever with respect to such third party sites and your usage of them.

- **Cookies**

We use different forms of cookies and other technologies or methods of web analysis to gather, store, and track certain information related to your visit to and activity through the Website.

A cookie is a piece of data stored on your computer containing information about your access to the Website. We and our trusted partners may use such cookies for various different purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier. We may use cookies to track user traffic patterns. Our advertising system may deliver a cookie to better track ad impressions and click rates.

The cookie will enable us to relate the customer's use of this Website to information that the customer has specifically and knowingly provided but the only personal information a cookie can contain is information the customer supply. A cookie cannot read data of the customer's hard disk or read cookie files created by other sites.

The customer can refuse cookies by turning them off in the customer browser. If the customer has set the customer's browser to warn the customer before accepting cookies, the customer will receive the warning message with each cookie. You may remove the cookies by following the instructions of your web browser; however, if you choose to disable cookies, some features of our Website may not operate properly and your online experience may be

limited.

Member Communications and Email

We employ a strict policy against sending unsolicited email. Please note the opting not to receive email does not exempt the customer from receiving administrative emails that include but are not limited to, notices about vital program and membership status changes, Privacy Policy and Terms of Service updates and purchase and redemption confirmation emails, if any.

Our Customer Care department may contact the customer in response to the customer's inquiries, to provide services at the customer's request and to manage the customer traveling/ticketing requirement. We will communicate by email or telephone in accordance with the customer's wishes.

- **Security**

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect the customer's personal information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Website, and we make no warranty, express, implied or otherwise, that we will prevent such access.

We reserve the right to disclose the customer's personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our Website.

- **Children's Privacy**

Use of our Website is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872. If you are a minor i.e. under the age of 18 years, you may use our Website only with the involvement of a parent or guardian.

- **Indemnification**

You agree to defend, indemnify and hold the Website and the Company harmless, on demand, from and against any and all claims, damages, costs, and expenses, including attorneys' fees, arising from or related to your use of the Website.

- **Dispute Resolution**

In the event of any dispute, difference or claim arising out of this Privacy Policy the same shall be settled in accordance with the Laws of India through regular judicial process and the courts of [•], India shall have exclusive jurisdiction.

- **Changes to this Privacy Policy**

We may amend this Privacy Policy from time to time. If we make any material changes in the Privacy Policy in such a way we use the customer's personally identifiable information collected at this Website, we will notify the customer by email and at the top of this Privacy Policy web page. Please note that we review our Privacy Policy from time to time, and we may make periodic changes to the policy in connection with that review. Therefore, the customer may wish to bookmark this page and/or periodically review this page to make sure the customer has the latest version.
