

<b>SAMUNNATI AGRO SOLUTIONS PRIVATE LIMITED</b>	
<b>POLICY</b>	Privacy & Disclosure Policy
<b>Reviewing Authority:</b>	Board of Directors
<b>Approving Authority:</b>	Board of Directors
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<b>Effective Date</b>	May 26, 2023
<b>Review Cycle:</b>	Annually or as recommended by the Board of Directors

## Privacy & Disclosure Policy

Samunnati Agro Solutions Private Limited (SASPL) recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with SASPL. Keeping personal information of customers secure and using it solely for activities related to SASPL and preventing any misuse thereof is a top priority of SASPL. SASPL has adopted the privacy policy aimed at protecting the personal information entrusted and disclosed by the customers [“the Policy”]. This policy governs the way in which SASPL collects, uses, discloses, stores, secures and disposes of personal information and sensitive personal data or information.

### **Definitions**

“Personal Information” means any information that relates to a natural person, which is capable of identifying such person, either directly or indirectly, either independently or in combination with other information, either available or likely to be available with SASPL.

“Sensitive Personal Data or Information” of a person or business legal entity means such personal/Business information which consists of information relating to any or all of the following:

- password;
- financial information such as details pertaining to a Bank account or credit card or debit card or any other payment instrument;
- physical, physiological and mental health condition;
- sexual orientation;
- medical records & history;
- biometric information;
- any detail relating to the above clauses as provided to SASPL for providing service, or received by SASPL for processing, stored or processed under lawful contract or otherwise.

Provided that the following shall not be regarded as sensitive personal data or information for the purposes of this policy:

- any information that is freely available or accessible in public domain or furnished under the right to information act, 2005 or any other law for the time being in force
- information obtained from a business legal entity in addition to "personal information"
- KYC and other information provided by the customer at the time of commencing a relationship or any time thereafter;
- any information about transactions with SASPL
- any information that has been obtained by SASPL from a third person without any obligations of confidentiality
- any information furnished pursuant to any directions of a governmental authority or court of law; or
- any information that was rightfully in SASPL’s possession prior to receipt from the Customer free of any obligation of confidence.

### **Applicability**

This Policy is applicable to personal information and sensitive personal data or Information collected by SASPL or its affiliates directly from the customer or through SASPL's online portals, mobile apps and electronic communications as also any Sensitive Personal Data or Information collected by SASPL's server from the customer's browser.

### **Purpose of Collection and Use of Personal Information**

SASPL collects and uses the financial information and other Personal Information from its customers. This information is collected and used for specific business purposes or for other related purposes designated by SASPL or for a lawful purpose to comply with the applicable laws and regulations. SASPL shall not divulge any Sensitive Personal Data or Information collected from the customer, for cross selling or any other purpose.

The authenticity of the Personal Information provided by the customer shall not be the responsibility of SASPL.

### **Disclosure of Personal Information**

The personal information collected by SASPL shall not be disclosed to any other organization except:

1. where the disclosure has been agreed upon in a written contract or otherwise between SASPL and the customer.
2. where SASPL is required to disclose the personal information to a third party on a need- to-know basis, provided that in such case SASPL shall inform such third party of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of SASPL.
3. Where SASPL is required to furnish the personal information pursuant to any directions of a governmental authority or court of law.

### **Reasonable Security Practices and Procedures**

The security of personal information is priority and will be protected by maintaining physical, electronic, and procedural safeguards that meet applicable laws. SASPL shall take reasonable steps and measures to protect the security of the customer's Personal Information from misuse and loss, unauthorized access, modification or disclosure. SASPL will maintain its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. SASPL will ensure that its employees and affiliates respect the confidentiality of any Personal Information held by SASPL.

### **Exclusions**

Notwithstanding anything mentioned in the Policy, the Policy shall exclude information that is needed to be shared with others due to extant regulations e.g., credit bureaus, CKYC registry, ROC, RBI and also where SASPL is legally bound to disclose information including but not limited to FIU, Enforcement Directorate, IT department or as required by a Court of Law.

**Contact Information**

In order to address any discrepancies or grievances related to the personal information residing with SASPL, the customer may contact our grievance officer, Mr. Chandra Sekhar Nallagonda, Head- IT Infra- Samunnati Financial Intermediation & Services Private Limited at [customervoice@samagro.in](mailto:customervoice@samagro.in)

**Notice of change**

SASPL may, from time to time, change this Policy. The effective date of this Policy, as stated below, indicates the last time this Policy was revised or materially changed.

**Cookie policy**

SASPL digital platforms use various third party analytical tools. These tools use cookies which are downloaded to your device when you visit a website in order to provide a personalized browsing experience. Cookies are used for lots of tasks like remembering your preferences & settings, provide personalized browsing experience and analyze site operations. These cookies collect information about how users use a website, for instance, how often visited pages. All information collected by third party cookies is aggregated and anonymous. By using our website user/s agree that these types of cookies can be placed on his/her device. User/s is free to disable/delete these cookies by changing his/her device / browser settings. SASPL is not responsible for cookies placed in the device of user/s by any other website and information collected thereto.

**Effective Date**

The policy would come into effect from the date of review and approval by the Board of Directors.