

## FRSLABS PRIVACY POLICY

Our privacy commitment: Our goal is to provide you a safe and personal experience. We only collect information that we actually need to serve you, with your fullest consent. We have never sold your information to anyone for any purpose. And we never will. And we remain committed to this promise.

THIS PRIVACY POLICY IS AN ELECTRONIC RECORD IN THE FORM OF AN ELECTRONIC CONTRACT FORMED UNDER THE INFORMATION TECHNOLOGY ACT, 2000 AND THE RULES MADE THEREUNDER AND THE AMENDED PROVISIONS PERTAINING TO ELECTRONIC DOCUMENTS / RECORDS IN VARIOUS STATUTES AS AMENDED BY THE INFORMATION TECHNOLOGY ACT, 2000. THIS PRIVACY POLICY DOES NOT REQUIRE ANY PHYSICAL, ELECTRONIC OR DIGITAL SIGNATURE.

THIS DOCUMENT IS PUBLISHED AND SHALL BE CONSTRUED IN ACCORDANCE WITH THE PROVISIONS OF THE INFORMATION TECHNOLOGY (REASONABLE SECURITY PRACTICES AND PROCEDURES AND SENSITIVE PERSONAL DATA OF INFORMATION) RULES, 2011 UNDER INFORMATION TECHNOLOGY ACT, 2000; THAT REQUIRE PUBLISHING OF THE PRIVACY POLICY FOR COLLECTION, USE, STORAGE AND TRANSFER OF SENSITIVE PERSONAL DATA OR INFORMATION.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING OUR WEBSITE/SOFTWARE/SERVICES/API/SDK, YOU INDICATE THAT YOU UNDERSTAND, AGREE AND CONSENT TO THIS PRIVACY POLICY. YOU HEREBY PROVIDE YOUR UNCONDITIONAL & IRREVOCABLE CONSENT TO FRSLABS FOR THE PURPOSES PRESCRIBED HEREUNDER.

This Privacy Policy describes the ways FRSLABS ("We", "Us", "Our") through its applications, SDK, API, Cloud services and Website collects, stores, uses, shares, protects Personal and Sensitive Personal Information that receive from you i.e. the end user ("You" or "Your", "User" or "End User") directly or indirectly. We respect your need for protection of the Personal Information you may share with us and protects it in an appropriate manner to ensure your online privacy as detailed herein below. FRSLABS complies with the Indian law on Data Protection and this policy is published in compliance with provisions of the Information Technology Act 2000.

### **Privacy Policy and Data Protection.**

The Privacy Policy sets out: The type of information collected from Users; The purpose, means and modes of usage of such information; How and to whom we will disclose such information. The User is expected to read and understand the Privacy Policy, so as to ensure that he or she has the knowledge of: The fact that the information is being collected; The purpose for which the information is being collected; The intended recipients of the information; The name and address of the entity that is collecting the information and the entity that will retain the information; And the various rights available to such Users in respect of such information.

## **Definitions of Personal Information and Sensitive Personal Information as defined in IT Act 2000 and Rules.**

**Personal Information** is defined to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

**Sensitive Personal Data or Information** of a person means such personal information which consists of information relating to: Password; Financial information such as bank account or credit card or debit card or other payment instrument details; Physical, physiological and mental health condition; Sexual orientation; Medical records and history; Biometric information; Any detail relating to the above clauses as provided to body corporate for providing service; Any of the information received under the above clauses by body corporate for processing, stored or processed under lawful contract or otherwise.

**Collection of Personal Information:** Our goal is to provide you a safe and personalized experience. We only collect personal information that we actually need to serve you. And it is information that you actively give us when you sign up to use our products or services with your full consent. In addition, we gather non personal information about users in the background such as IP address, location, timestamp, software versions etc. By using our websites, products and services we have your explicit consent for the above data collection.

**Collection of Personal Data through our SDKs and APIs:** In order for proper functioning of some of the software features, such as scanning of documents (for optical character recognition), our software will collect and process ID document images and ID photos. The images and data extracted from such images will remain within the user's device and is not transmitted to FRSLABS servers. During beta testing or customer trials, performed under controlled conditions, usually time bound, and with informed consent, we may process such personal data in our servers. We may undertake further analysis of the images, data and photos on the ID uploaded to our servers to verify the authenticity of the ID, improve the recognition accuracy and improve overall quality of the software. We do not share any personal data obtained through this application with any other third parties.

**Use of Personal Information:** We will use your personal information for technical support and improving our products and services. We limit access to your personal information to our employees who have a legitimate need to use it. We have never sold your information to anyone for any purpose. And we never will.

**Collection of Sensitive Personal Information:** We do not directly collect any sensitive personal information from you. When you buy something from us, we ask you to provide your name, contact information and payment information for the purpose of collecting payment or initiating refunds. Payments are processed through regulated payment gateways.

**Use of Sensitive Personal Information:** We shall use the bank details provided by you only for the purpose of accepting payments. Other Sensitive Personal information disclosed to us by our Customer is used only for the purpose of the service offered to our Customers.

**Use of Cookies:** We use various technologies, including “cookies”, to collect non-identifiable information. A cookie is a piece of data that any website can send to Your browser, which may then be stored on Your computer as an anonymous tag that identifies Your computer but not You. To enhance Our Service, some FRSLABS pages use cookies, sent by FRSLABS or its third party vendors, or other technologies. You may control the effect of cookies through Your browser settings, however some features of FRSLAB’s Services may not work properly if Your use of cookies is disabled.

**Disclosure Policy:** We shall not disclose your Personal or Sensitive Personal Information to anyone except under the following circumstances: To our partners, agents, contractors, affiliates or consultants who act for or on our behalf for further processing in accordance with the purpose for which the information was originally collected or may otherwise be lawfully processed. Also, Personal or Sensitive Personal Information may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceedings.

**Links to Third Party Websites:** Our software and websites may include links to other third parties whose privacy practices may differ from ours. If you access such third party websites and voluntarily submit personal information to any of those websites, such information submitted by you will be governed by the privacy policies of such third party websites and we disclaim all responsibility or liability with respect to such third party policies or websites. We advise that you read the privacy policy of any third party website that you visit.

**Change Notice:** We reserve the right, at any time and without notice, to change this Privacy and Disclosure Policy, simply by communicating the same to you via email or SMS or posting in our website. Regardless of later updates, we will never use the information you submit in a new way without first providing you with an opportunity to prevent that use.

**Retention:** The information submitted by you shall be held for as long as is required to access the service requested and as required by law.

**Notification and Consent:** IT Act 2000 does not require to obtain your consent separately for the collection, use or disclosure of personal information for the purpose of providing services. By accepting the use of the services provided by us, we assume, unless you advise us otherwise, that you have given your consent to us for collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us). IT Act 2000 requires your express consent for collection, use or disclosure of your sensitive personal information. By

accepting this policy electronically you have given your express consent to the terms and conditions embodied herein. You may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to the Privacy/Grievance Officer at [admin@frslabs.com](mailto:admin@frslabs.com). In case you do not provide consent or withdraw your consent at a later stage, we shall have the option of not providing you the services for which the said information was sought including termination of contract between us. On termination of this agreement or withdrawal of consent, all personal information will be deleted from our records unless required by law.

**Review:** You can review and amend your personal information. If you update any of your personal information, we may keep a copy of the information which you originally provided in its archives. This is a means to keep a personal record lineage and will not be used for anything other than for the purpose it was collected in the first place.

**Authenticity:** We shall not be responsible in any manner for the authenticity of the personal information or sensitive personal information or information supplied by you.

**Reasonable Security Practices:** We maintain 'reasonable security practices and procedures' to protect the Personal and Sensitive Personal Information provided by you and has implemented industry standard security practices including but not limited to strong encryption at transit and storage, authorized access on a need to know basis and regular training of our personnel.

We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input in addition to maintaining security of your information as per the International Standard like IS/ISO/IEC 27001 (as per the availability) on "Information Technology Security Techniques Information Security Management System-Requirements". We train and require our employees to safeguard your information. We also use physical, electronic and procedural safeguards by restricting access to personal information to those employees and agents for business purposes only. Additionally, we use internal and external resources to review the adequacy of our security procedures.

We are not liable for any loss of any personal or sensitive personal information provided by you, due to reasons or causes or conditions beyond its control including but not limited to corruption of data, strike, riots, civil unrest, Govt. policies, tampering of data by unauthorized persons like hackers, war and natural calamities.

**Redressal of grievances:** Should you have questions about this Privacy Policy or our information collection, use and disclosure practices, you may contact, the Data Protection Officer appointed by us. We will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your personal information. If you have any grievance with respect to our use of your information, you may communicate such grievance to the Data Protection Officer at [admin@frslabs.com](mailto:admin@frslabs.com).

## A) Quality, Information Security Policy of the Organization

### Integrated Quality and Information Security Policy

FRSLABS aims to be a market leader in the field of customer onboarding (KYC), authentication and fraud prevention solutions for enterprises. The company is committed to solving complex problems upholding quality, security and privacy at its heart.

**Further, the company continually strives to:**

- Fulfil all its applicable compliance obligations
- Preservation of confidentiality, integrity and availability of information it possesses, uses or that is handled by its products.
- Education and training to create awareness and inculcate a spirit of responsibility among all employees.
- Continual improvement in quality and information security performance, through measurable objectives.
- Promote risk-based thinking in all its processes to achieve total customer satisfaction.
- Communication of this policy to all stakeholders for their adherence to the organisation's policies and contribute to the efficiency of the management system