

PRIVACY POLICY

The domain name <https://www.axiscapital.co.in> hereinafter referred to as ("Website") and together with the other Applications, being referred as "App" is owned by Axis Capital Limited ("ACL"). For the purposes of this Privacy Policy, wherever the context so requires the term "You" or "User" shall mean any natural or legal person including online and offline clients and the term "We", "Us", "Our" shall mean or refer to ACL.

Your privacy is of utmost importance to Us and protection of Your Personal Data as disclosed by You to Us is a key commitment for Us. We at ACL respect the privacy of everyone who visits/ uses the App and are committed to maintaining the privacy and security of the personal information of anyone who visits, accesses, or uses our Website: <https://www.axiscapital.co.in> or visits/ uses our App. Please note that the use of this Website/ App is subject to other conditions, such as Terms of Use and Disclaimer available on the Website/ App.

We view protection of your privacy as a very important principle. We store and process Your Information including any sensitive financial information collected (as defined under the Information Technology Act, 2000), if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures in accordance with the provisions of applicable law in India including the Information Technology Act 2000, the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, The Digital Personal Data Protection Act, 2023 (upon it being enforced) to maintain the privacy of Your Personal. If You object to Your Information being transferred or used in this way, please do not provide any identifiable/ personal information on the Website/ App.

We and our affiliates may share/sell/transfer / license / convey some or all of your personal information with another business entity to carry out any business activity or re-organization, amalgamation, restructuring of business or for any other reason whatsoever. Once you provide your information to us, you provide such information to us and our affiliate and we and our affiliate may use such information to provide you various services.

The Privacy Policy on our collection and use of personal information and other information is outlined below.

i. Collection of Sensitive Personal Data or Information

ACL may for the purpose of rendering its services, collect personal information such as:

- Name, Gender, Residential / Correspondence Address, Telephone Number, Date of Birth, Marital Status, Email Address or Other Contact Information like PAN, KYC Status, Signature, Photograph or Aadhaar details.
- Bank account or other payment instrument details, credit history and records (to the extent applicable)
- Transaction Information: We may read SMS to retrieve OTP sent by ACL during login or transaction related authentication
- Access to your mobile camera device for the purpose of on-boarding/ KYC requirements only and for the functioning of many Platform functionalities including, but not limited to scan and pay, etc. Access to device camera is required. Permission is sought for the same at an appropriate stage during the Platform usage.
- We may also periodically collect meta data information of apps installed on your mobile device which includes the application's name, package name, installed time, updated time, version name and version code of each installed application, understand the usage of applications like VPN, gaming applications on your device to assess for fraud, if any and also to understand your risk profile.

ii. Information Supplied by Users

To avail certain services on the App, users are required to provide certain personally identifiable information for the registration process which may include: -

- Your Name
- Email Address
- Phone Number
- Debit card, Credit card, Bank details and any other such information as required. The Information as supplied by the users enables us to improve the App services and provide you the most user-friendly experience. In some cases, / provision of certain service(s) or utility(ies), we may require your contact address as well.

All required information is service dependent, and the Company may use the above said user Information to, maintain, protect, and improve the App services and for developing new services. We may also use your phone number, email address or other personally identifiable information to send commercial or marketing messages without your consent [with an option to subscribe / unsubscribe (where feasible)]. We may, however, use your SMS, email address and phone number without further consent for non-marketing or administrative purposes (such as notifying you of major changes, for customer service purposes, providing information about updates to App services etc.).

Any personally identifiable information provided by you will not be considered as sensitive if it is freely available and / or accessible in the public domain. Further, any reviews, comments, messages, blogs posted/uploaded/conveyed/communicated by users on the public sections of the Website or an Application Store (like the App Store or Play Store) becomes published content and is not considered personally identifiable information subject to this Privacy Policy.

In case you choose to decline to submit personally identifiable information on the App/Website, we may not be able to provide certain services on the App/Website to you. We will make reasonable efforts to notify you of the same at the appropriate time. In any case, we will not be liable and or responsible for the denial of certain services to you for lack of you providing the necessary personal information.

When you register with the App services, we may contact you from time to time about updating of your personal information to provide the users such features that we believe may benefit / interest you.

iii. Communications

When You use the Website or send emails or other data, information or communication to us, you agree and understand that You are communicating with Us through electronic records, and You consent to receive communications via electronic records from Us periodically and as and when required. We may communicate with you by email or by such other mode of communication, electronic or otherwise.

iv. Log File Information Collected and Stored Automatically

If you visit/ log into our Website just to browse, read pages or download information, we gather and store certain information about your visit automatically. This information cannot and does not identify you personally. When you register with or view our Website, our servers automatically record certain information that your web browser sends whenever you visit our Website. The kind of information that is gathered automatically include the type of browser you are using (e.g. Internet Explorer, Firefox, etc.), the type of Operating System you are using (e.g. Windows or Mac OS) and the domain name of your Internet Service Provider, the date and time of your visit and the pages on our Website. We sometimes use this information to improve our Website(s) design, content and primarily to give you a better browsing experience.

However, users and viewers are informed that by using the Website: <https://www.axiscapital.co.in> they are deemed to have consented to the collection and use of information by ACL as stated above.

v. Updating or Reviewing Your Sensitive Personal Data or Information

You may upon written request to us review the sensitive personal data or information provided. ACL shall ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible.

vi. Reasonable Security Practices for Protecting Information

ACL uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. ACL cannot, however, ensure or warrant the security of any information you transmit to ACL, and you do so at your own risk. Once we receive your transmission of information, ACL makes commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. To protect your privacy and security, ACL take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from ACL, at all times.

vii. Notification Procedures

ACL provide notifications, whether such notifications are required by law or are for marketing or other business-related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our Website page, as determined by ACL in its sole discretion. ACL reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

viii. Changes to Our Privacy Policy

Please note that this Privacy Policy may change from time to time. If ACL change its privacy policies and procedures, ACL will post those changes on the Website to keep you/users aware of what information ACL collect, how ACL use it and under what circumstances ACL may disclose it. Changes to this Privacy Policy, Disclaimers or terms of Use are effective when they are posted on the Website/ App. Please visit our Website/ App to keep yourself abreast of any changes to this Privacy Policy.

ix. Children's Privacy

Our Website and App are not directed towards children under the age of 13. We do not knowingly collect personal information from children.

x. Your Choice

You have the rights to:

- Access, correct, or delete your personal information.
- Opt-out of receiving promotional communications.
- Manage cookie preferences through your browser settings.

xi. Account Deletion Policy

Account deletion is not possible due to compliance with regulatory requirements and SEBI guidelines. ACL is subject to strict regulations and guidelines set by SEBI, which mandate the retention of certain records and data for a period of at least 9 yrs. Deleting account deletion

compromise our ability to meet these regulatory obligations, potentially resulting in non-compliance and associated risks.

xii. Cookie Policy

ACL's Website/ Apps may use various third-party services to promote ACL's products and services. The Website/ Apps use cookies which are downloaded to your device when you visit the Website/ App to provide a personalized browsing experience. The cookies are used for lots of tasks like remembering your preferences and settings, provide personalized browsing experience and analyse site operations. These cookies collect information about how users use a Website/ App, for instance, how often a user has visited the web pages.

All information collected by third party cookies is aggregated and anonymous. By using our Website/ App, 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. ACL is not responsible for cookies placed in the device of User/s by any other website and information collected thereto. This Privacy Policy does not extend to any third-party website links or information collected thereto.

xiii. Usage of App Set ID

Usage: App set ID must not be used for ads personalization and ads measurement.

Association with personally identifiable information or other identifiers: App set ID may not be connected to any Android identifiers (for example, AAID) or any personal and sensitive data for advertising purposes.

xiv. Reasonable Security Practices and Procedures

We take the security of Your information very seriously. To this end, we use several security techniques including secure servers, firewalls and encryptions. We have in place appropriate administrative, technical, physical safeguards and security measures to protect the Personal Data / personally identifiable information You provide to us against accidental, unauthorized or unlawful loss, destruction, damage, alteration, access, disclosure or use and any other unlawful forms of processing.

We employ comprehensive security measures to protect client's personally identifiable information from unauthorized access, disclosure, alteration, or destruction. These measures include:

- Encryption of sensitive data during transmission and storage
- Regular security assessments and updates to our systems
- Access controls and authentication processes
- Employee training on data security and privacy policies

At ACL, we uphold stringent security practices to ensure the protection and confidentiality of your personally identifiable information during data collection, at-rest storage, and in-transit sharing with our data processing partners.

xv. Contact Us

If you have any queries, feedback, questions, or concerns regarding the collection, processing, usage, disclosure, and security of your information/data, or any aspect of this Privacy Policy including withdraw your consent to provide any personal information, please address them to complaints@axiscap.in with valid credentials and background information.

xvi. Policy Review & Updates

This Privacy Policy will be reviewed by Us as and when required and the same may be subject to change at any point in time. While We will make reasonable efforts to keep you posted on any

updates to this Privacy Policy, to make sure that you are aware of any changes, we recommend that you review this Privacy Policy periodically.

xvii. Governing Law & Jurisdiction

This Privacy Policy will be governed by and construed in accordance with the laws of India and subjected to the exclusive jurisdiction of Courts of Mumbai.