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## **Greetings and Welcome to SajiloPay**

This Policy outlines about data we collect from you ("you," "your," "yours", "User"), where this data is stored, and how it will be treated. The policy applies only to data collected through our website and not to data collected offline. By using SajiloPay Platform or services, you consent to our online privacy policy.

### **Section A: Data Collection and its use**

#### **1 Data Collection**

There is no restriction to visit SajiloPay Platform without sharing your Personal or Non-Personal data. However, in order to get registration in our SajiloPay Platform and/or enjoy/avail services offered to registered users you may be asked to share with us your Personal and Non-Personal data.

When you provide your data, you hereby consent to the collection, storage, processing, disclosure and/or transfer of any or all of your **Personal & Non-personal Data**.

##### **1.1 Personal Data:**

Personal Data is the data that can be associated with a specific person and could be used to identify that specific person whether from that data, or other data that we have, or is likely to have access to. Your personal data shall include but may not be limited to the following:

- i) Account data (Your Name, Parent's Name, Address, telephone number, e-mail address, Date of Birth, Gender, Marital Status and other demographic data).
- ii) Any other data provided by you as part of "Know Your Customer" norms as required under applicable laws.
- iii) Data related to transactions processed on Sajilo Pay platforms, excluding payment instrument details.
- iv) Passwords, Biometric data
- v) Financial data such as Bank account or credit card or debit card or other payment instrument details.
- vi) Data about your friends and contacts: It may be easier for us to help you transact with your friends and contacts if you choose to connect your contact list data with your Account. If you establish a connection between your device or a social media platform and establish an

account connection between your device or a social media platform and your account, we will collect and use your contact list data (such as name, address, email address) to improve your experience when you use the Services.

## **1.2 Non-Personal Data:**

We may collect non-personal data while you access SajiloPay platform via URL, mobile phone or any other devices. This data shall not identify "you" as a person. Your non-personal data shall include but may not be limited to the following:

- i) Computer and device data: Data about your computer, internet connection and mobile device, including your IP address, operating systems, platforms, browser type, other browsing data (connection, speed, connection type etc.), device type, device's unique device identifier, mobile network data and the device's telephone number.
- ii) Location data: Our applications collect real-time data about the location of your device, as permitted by you.
- iii) Mobile device IDs: Unique mobile device identifier (e.g. IDFA or other device IDs on Apple devices like the iPhone and iPad), if you're using our Services on a mobile device, we may use mobile device IDs (the unique identifier assigned to a device by the manufacturer), instead of cookies, to recognize you. We may do this to store your preferences and track your use of our applications.
- iv) Your activity on the Services: Data about your activity on the Services, such as your domain names, search results selected, number of clicks, pages viewed and the order of those pages, how long you visited our Services, the date and time you used the Services, error logs, and other similar data.
- v) Your preferences: Your preferences and settings such as language.
- vi) OTP sent to you by your issuer bank or SajiloPay platforms exclusively to carry out transactions on SajiloPay platforms.
- vii) Your messages and feedback shared on SajiloPay Platforms and Social Media.
- viii) Other data we collect related to your use of our Sites or Services: We may collect additional data from or about you when you communicate with us, contact our customer support teams or respond to a survey.

**1.3** Data may be collected in various ways and formats during the course of your visit or access to SajiloPay Platforms. It may be by way of:

- i) Visiting SajiloPay platforms.
- ii) Registering on SajiloPay platforms as a “user” or “merchant” or any other relationship that may be governed by terms and conditions listed on SajiloPay platforms.
- iii) Transacting or attempting to transact on SajiloPay platforms.
- iv) Accessing, links, e-mails, notifications sent or owned by SajiloPay platforms.

## **2 Use of Data**

Your personal data may be used for following purpose:

**2.1** To operate the Sites, mobile application and provide the Services, including to:

- i) Initiate a payment, send or request money, add value to an account, or pay a bill;
- ii) Authenticate your access to an Account;
- iii) Communicate with you about your Account, the Sites, the Services;
- iv) Create an account connection between your Account and a third-party account or platform;
- v) Perform creditworthiness and other financial standing checks, evaluate applications, and compare data for accuracy and verification purposes.
- vi) Keep your Account and financial data up to date.

**2.2** To manage our business needs, such as monitoring, analyzing, and improving the Services and the Sites’ performance and functionality.

**2.3** To manage risk and protect the Sites, the Services and you from fraud by verifying your identity. SajiloPay’s risk and fraud tools use Personal Data, Device Data, Technical Usage Data and Geolocation Data from our Sites and mobile application that offer SajiloPay Services to help detect and prevent fraud and abuse of the Services.

**2.4** To market to you about SajilPay Services. We may also Process your Personal Data to uniquely tailor the marketing content and certain Services or Site and application experiences to better match your interests on SajiloPay.

- 2.5** To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Data through the Services. We will use this data to enhance the security of the Sites and Services and provide you with location-based Services, such as advertising, search results, and other personalized content.
- 2.6** To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all applicable laws and regulations.
- 2.7** To make it easier for you to find and connect with others, we may use your data you have shared with the Service to suggest connections between you and people you may know.
- 2.8** To respond to your requests, for example to contact you about a question you submitted to our customer service team.
- 2.9** To conduct research and development activities relating to SajiloPay business.

### **3 Sharing of Data**

We may share your Personal and Non-Personal Data with others in a variety of ways for the following reasons:

- 3.1 With other members of the SajiloPay corporate family:** We may share your Personal and Non-Personal Data with members of the SajiloPay family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of SajiloPay Services, and communications.
- 3.2 With other companies that provide services to us:** We may share Personal and Non-Personal Data with third-party service providers that perform services and functions at our direction and/or on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.
- 3.3 With other financial institutions:** We may share Personal and Non-Personal Data with other financial institutions that we have partnered with to jointly create and offer a service. These financial institutions may only use this data to market and offer SajiloPay-related services, unless you have given consent for other uses.
- 3.4 With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers:** We may share data about you and your account with the other parties involved in processing your transactions. This includes other Users you are sending or receiving funds from merchants and their service providers when you use the Services to pay for goods or services. The data includes:
  - i) Personal Data and Account data necessary to facilitate the transaction;
  - ii) Data to help other participant(s) resolve disputes and detect and prevent fraud; and
  - iii) Aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance Users' experiences.

### **3.5 With other third parties for our business purposes or as permitted or required by law:**

We may share data about you with other parties for SajiloPay's business purposes or as permitted or required by law, including:

- i) If we need to do so to comply with a law, legal process or regulations;
- ii) Law enforcement, regulators, government officials, or other third parties court order, or other legal process or requirement under law or regulation, or the laws and regulations of other jurisdictions that are applicable to SajiloPay or one of its affiliates; when we need to do so to comply with such law or when we believe, in our sole discretion, that the disclosure of Personal and Non-Personal Data is necessary or appropriate to prevent physical harm or financial loss; or to report suspected illegal activity or to investigate violations of a user agreement;
- iii) to protect the vital interests of a person;
- iv) to protect our property, Services and legal rights;
- v) to facilitate a purchase or sale of all or part of SajiloPay's business;
- vi) to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services,
- vii) to credit reporting and collection agencies;
- viii) to support our audit, compliance, and corporate governance functions.

**3.6 With your consent:** We also will share your Personal and Non-Personal Data and other data with your consent or direction, including if you authorize an account connection with a third-party account or platform.

**3.7** In addition, SajiloPay may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide data about your use of the Sites or Services. We do not share your Personal and Non-Personal Data with third parties for their marketing purposes without your consent.

## **Section B: Data Protection and Security**

## **1 Protection and Security**

SajiloPay has a dedicated secure server and all users' sensitive personal data (such as credit card data, bank account details etc.) is transmitted via Secure Socket Layer technology and then encrypted into our payment gateway database which is accessible to only those authorized with special access rights to such systems. The authorized ones must keep the data confidential and sign confidential agreement with SajiloPay.

SajiloPay does not trade or otherwise transfer your personal data to any outsiders. Outsiders do not include trusted third parties who work with us in operating our website, application software, one supporting us in conducting our business or those servicing you, so long as those parties agree to keep this data secret and confidential.

SajiloPay reserves the right to suspend, hold funds, block user and report to law enforcement authorities in case of any suspicious and illegal behavior of user. In that case you agree that your personal data will be made available to law enforcement authorities.

Non-personally identifiable user data may be provided to other parties for marketing, advertising, or other uses at our own discretion.

## **2 Cookies**

SajiloPay uses cookies to understand and save customer preferences for future visits and compile data in aggregate about site traffic and site interaction so that we can offer better site experiences and tools in future.

## **Section C: Miscellaneous**

### **1 Opt Out**

If you do not want to receive promotional or similar other non-essential notices or communication from SajiloPay you may opt out of receiving such non-essential data from us by setting up in your account.



## **2 Children Policy**

SajiloPay services are not directed to or intended for person coming under the definition of Minor as per Nepal Laws. However, SajiloPay may collect Personal Information about Minor from the parent or guardian directly, and with that person's explicit consent.

## **3 Changes in Policy**

If there are any updates in our privacy policy, we will post those changes on this page from time to time