



NIUM

PRIVACY NOTICE

October 2020
INDIA

1. PRIVACY NOTICE

NIUM INDIA PRIVATE LIMITED AND ITS AFFILIATES' AND SUBSIDIARIES (FORMERLY KNOWN AS InstaReM India Pvt. Ltd.) (COLLECTIVELY, "InstaReM (POWERED BY NIUM)", "WE", "OUR", "US") RESPECTS YOUR RIGHTS TO PRIVACY. INSTAREM (POWERED BY NIUM) DEALS WITH PERSONAL INFORMATION COLLECTED IN ACCORDANCE WITH THIS PRIVACY NOTICE. WHEN USED IN THIS NOTICE, "PERSONAL INFORMATION" REFERS TO ANY INFORMATION, WHICH RELATES DIRECTLY TO OUR CUSTOMERS AND USERS OF WWW.INSTAREM.COM OR THE MOBILE APPLICATION HEREINAFTER REFERRED TO AS "SITE".

Through this Privacy Statement, we want to reassure users that we will not sell, share, or rent user information to others in a manner different than in this Privacy Statement. By accessing the Site, you agree to be bound by this Privacy Statement. Each time you use the Site, the current version of this Privacy Statement will apply.

2. WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT AND RESERVE?

INSTAREM (POWERED BY NIUM) collects information from users at several different points, including, without limitation when a user:

- a) registers on the Site;
- b) avail the product or service;
- c) request foreign exchange quotes;
- d) submits an e-mail;
- e) your Government identification document numbers, such as Aadhaar card information, Pancard, passport, driving license, proof of identity (POI) and proof of address (POA) details, etc.;
- f) name, address, email address, mobile and home telephone number, age, date of birth, gender, citizenship, salary range, occupation and other relevant contact information;
- g) information involving your account information, bank account details including debit, credit and transaction history with INSTAREM (POWERED BY NIUM);
- h) computer and mobile device information, such as the domain and host you use to access the Internet; your computer's IP address; mobile device geolocation, number and other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; the browser and operating system software you use; websites you have visited or later visit, social profile and network information; the date and time you access our website, the internet address used to link to our website when you visit us and cookie information.

INSTAREM (POWERED BY NIUM) monitor traffic patterns on the Site for aggregate use to analyze trends and administer the Site to improve its layout, design, and provide unique offers to users. We also monitor traffic patterns to permit Site personalization and streamlining to create a positive experience for our users, this is known as behavioral marketing. To perform analysis permitting such personalization and improvement, we may employ third parties with whom we share the information necessary to accomplish these objectives. These statics include no personally identifying information.

Where appropriate, we may share aggregated statistical information with our business partners. These statistics include no personally identifying information.

Except as stated below, we will not share, sell or rent your e-mail address or mobile phone number to third parties. But, we may do so between our affiliates and subsidiaries. We may, however, share e-mail addresses, mobile phone numbers and limited personal details with reputable third parties in order to help us provide better services.

These third parties agree not use your information for their own marketing purposes.

INSTAREM (POWERED BY NIUM) is required to collect, reserve and share certain personal information under the Anti-Money Laundering and Counter-Terrorism Financing rules and other subordinate instruments (AML/CTF Laws).

We may provide personally identifying and/or account information in special case such as enforcement of our Disclaimers, as required by law or legal process to protect and defend the rights and safety of our Site and its users. This includes exchanging information with other companies for purposes of fraud and credit risk reduction.

By using our Site you agree to the terms and conditions set forth in this Privacy Statement and the site Disclaimers INCLUDING ALL LIMITATIONS OF DAMAGES PROVISIONS, which are an integral part of this Privacy Statement. By using our Site, You consent to the collection, transfer, storage and use of this information by as disclosed in this Privacy Statement.

3. WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We use your information in the following ways:

- a) to carry out our obligations relating to your contracts with us and to provide you with the information, products and services that you request from us;
- b) to comply with any applicable legal and/or regulatory requirements;
- c) to notify you about changes in our Services;
- d) as part of our efforts to keep our Services safe and secure;
- e) to administer our services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- f) to provide you with information about other similar goods and services we offer;

g) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you.

4. HOW DO WE COLLECT PERSONAL INFORMATION?

We collect most personal information directly from you by the following means:

- a) through the access and use of the INSTAREM (POWERED BY NIUM) website or mobile application;
- b) through your registration for our services and/or by setting up an account with us;
- c) through your response to our loyalty program, surveys, contests or claim to a prize announced by us from any financial transaction you make with INSTAREM (POWERED BY NIUM). All participation in such loyalty program, surveys, and contests or claim to a prize announced by us are subject to the applicable rules and terms and conditions of the particular loyalty program, surveys, contests or claim, if any;
- d) through your subscription to our electronic publication such as newsletters, rate broadcast;
- e) from 3rd party connected with you and/or dealing with us.

5. WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may share your personal information with other companies in the INSTAREM (POWERED BY NIUM) Group. Sometimes we may disclose your personal information to organizations outside the INSTAREM (POWERED BY NIUM) Group such as:

- a) to our contractors or service providers for the purposes of conducting business and providing our services or products to you, including web hosting providers, IT systems administrators and payment processors;
- b) to our intermediary banks in order to process certain transactions on your behalf, for example, by disclosing your name and address;
- c) to any of our partners, agents or intermediaries who are a necessary part of the provision of our products and services;
- d) to international intermediaries to complete your transactions;
- e) to credit reporting bodies, if you are a client of INSTAREM (POWERED BY NIUM), for the purpose of identifying you, in which case the information will be limited to your identity particulars, including but not limited to your name, gender, address, date of birth and proof of identity document;
- f) to any government regulatory bodies that normally require it or may request it.

6. SECURITY OF INFORMATION COLLECTED

To help protect your personal information from unauthorized access and use, we endeavor to use reasonable security measures. These measures can include physical, electronic and procedural safeguards such as computer safeguards and secured files and buildings. We also endeavor to limit access to personal information to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your personal information, transmissions to us, or may wrongly instruct you to disclose information to them by posing as INSTAREM (POWERED BY NIUM) or by misinforming you about our services. Always use caution and good judgment when sending money and when using internet and mobile technologies.

Since, no data transmission over the Internet or networks, or method of storage - electronic or otherwise can be guaranteed to be 100% secure. As a result, while we strive to protect your information, we cannot guarantee its absolute security.

7. DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?

We may disclose your personal information to recipients located outside India. These entities may include:

- a) INSTAREM (POWERED BY NIUM) Group companies;
- b) INSTAREM (POWERED BY NIUM) Group service providers; and
- c) International Intermediaries.

To effect, administer and complete transactions or deliver products or services including, but not limited to:

- a) companies which help us run or improve the running of our business or which help us deliver products and services to you and to banks, card companies, reference agencies, etc.;
- b) in order to comply with legal, regulatory, security and processing requirements, government (domestic and international) requirements, applicable to us or our affiliates or service providers, including but not limited to anti-money laundering laws; and
- c) to organizations which help us process transactions, validate customer information, and prevent debt, fraud, theft or loss.

We may disclose Information about current and former customers to perform marketing, business analysis and advertising services to companies with whom we have contractual or joint marketing arrangements upon notice that you have provided unambiguous consent (opt-in) for the use of Information for these purposes. In case you do not wish to receive such communication, you can explicitly write to privacy@INSTAREM.com with Subject "OPT OUT".

8. DO WE USE OR DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you products and services that we believe may interest you. We will not do this if you tell us not to. Unless you tell us not to, we will disclose your personal information to companies within the INSTAREM (POWERED BY NIUM) Group so that they can market their products and services to you.

We also have relationships with advertising companies, who may use cookies, pixels, web beacons, app or device information or related information to display advertising tailored to your interests or location. To opt-out of tailored advertising delivered by other advertising companies, you should choose the appropriate settings in your browser(s) (e.g., block cookies), device (e.g., turn "Location" of) and app(s). Please note that if you do not accept cookies or change your device or app settings, you may experience some inconvenience in your use of our website or app and some online or mobile products and services.

9. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us on the details provided under "Contact us". We retain your personal data for the period necessary to carry out the purposes outlined in this Privacy Notice, unless a longer period is required or permitted by law.

10. CHANGES IN THE PRIVACY NOTICE AND YOUR CONSENT

INSTAREM (POWERED BY NIUM) reserves the right to modify this Privacy Statement. We urge you to review this Privacy Statement when you visit to obtain the most current statement. You have to check periodically to view the change made in Privacy Notice, we shall not post those changes on our Site to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

11. RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS

If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details provided under 'Contact us'.

You may request (by contacting us in the manner set out below) details of the information we hold and request us to correct or erase any erroneous or out-of-date information. We reserve the right to independently verify any claims made.

To protect your privacy, we shall take reasonable steps to verify your identity before correcting any information per request. Where permitted by law, we reserve the right to collect a service charge for providing you any information in connection with your request. All information collected from the first instance with corrections shall be kept for 10 years or as per regulatory requirements. If you explicitly request for deleting all information the same can be only after 10 years or as per regulatory requirements, of your closure.

12. CONTACT US

You can contact us by writing to us at support@INSTAREM.com or post us at Address: NIUM INDIA PRIVATE LIMITED (FORMERLY KNOWN AS InstaReM India Pvt. Ltd.), Attn: Customer Service, 12011205, B-Wing, Kanakia Wall Street, Chakala, Andheri Kurla Road, Andheri East, Mumbai, Maharashtra, India 400093

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to privacy@INSTAREM.com

