

Dvara E-Registry Private Limited Privacy Policy

Welcome to the Dvara E-Registry mobile Mobile App and <https://www.dvaraeregistry.com/>, operated and owned by Dvara E-Registry (“Dvara”), which presently has its registered office at Chennai.

Dvara manages the website <https://www.dvaraeregistry.com/> including the mobile Application Door Drishthi App (the “Mobile App”) and the website (the “Website”). This Privacy Policy is a part of the [Terms and Conditions](#) to services provided by Dvara on Website and/or Mobile App.

All terms defined in the Terms and Conditions have the same meaning used here in this Privacy Policy. This Privacy Policy statement shall apply to all Users who visit and access Dvara’s Website. The Users unconditionally agree that browsing the Website and/or using its services signifies their unconditional assent to this Privacy Policy. We respect the privacy of it’s Users and is committed to protect it in all respects. Any dispute with Dvara over privacy matters are subject to this Privacy Policy read in conjunction with the Terms and Conditions.

1. This Privacy Policy is published in compliance of:
 - i. Section 43A of the Information Technology Act, 2000; and
 - ii. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPI Rules”) “Personal Information” and “Sensitive personal data or information” shall be as defined under the SPI Rules. The information about the Users as collected by Dvara is:
 - a. information supplied by Users and
 - b. information automatically tracked while navigation (Information).
2. In order to avail the Services offered by or on the Website and start investing, Users are required to register for an investment account and have to provide information and data (“**Personal Information**”) classified as ‘Sensitive Personal Information’ under Regulation 3 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**SPI Rules**”). Personal Information provided in acceptance of this Policy shall amount to written consent under Regulation 5 of the SPDI Rules.
3. This initial registration would involve creating a username which is a valid email and password (collectively, “**Login Credentials**”). Further, once the User decides to use all the functionality provided on the Website and decides to enrol for investment purposes, in accordance with the KYC norms and regulatory requirements, user shall provide its name, gender, contact number, address details (including a copy of the address proof) and a cancelled cheque leaf (collectively, your “**Registration Information**”).
4. Dvara will require the User to provide a virtual signature (physically on the mobile screen or an image of the signature on a plain white paper). Dvara will use this

signature only for the limited purpose of completing the enrolment process and it will not be used for any transactions other than filling forms for enrolment. This signature provided by the user will not be shared with any third parties.

5. By using Dvara's Website or its services, you give Dvara your consent to collection, storage, and use of the Personal Information you provide (including any changes thereto as provided by you) for any of the services that we offer. To avail certain sites/ services on our Websites, Users may be required to provide certain information for the registration process that may include but not limited to:
 - a. your name,
 - b. email address,
 - c. sex,
 - d. age,
 - e. PIN code,
 - f. Aadhar Card Details
 - g. biometric information,
 - h. password etc., and / or your occupation, interests, and the like.
6. Dvara presumes lawful parental consent in case the Personal Information is shared by a User under the age of 18 years. All required information is service dependent and Dvara may use the above said User information to, maintain, protect, and improve its services (including advertising services) and for developing new services. Such information will not be considered as sensitive if it is freely available and accessible in the public domain or is furnished under the Right to Information Act, 2005, any rules made there under or any other law for the time being in force. The primary reason for gathering information is to improve our products, deals, services, website content and navigation.
7. To improve the responsiveness and user interface for our Users, Dvara may use "cookies", or similar electronic tools to collect information to assign each User a unique, random number as a User Identification (User ID) to understand the User's individual interests using the identified computer. Unless you voluntarily identify yourself, Dvara cannot know who you are, even if we assign a cookie to your computer. The only Personal Information a cookie can contain is information you supply. A cookie cannot read data off your hard drive. Our advertisers may also assign their own cookies to your browser (if you click on their ads), a process that we do not control. We receive and store certain types of information whenever you interact with us via Website, Mobile Application or service through your computer/laptop/netbook or mobile/tablet/pad/handheld device etc.
8. Dvara automatically collects limited information about your computer's connection to the Internet, mobile number, including your IP address, when you visit our Website, Mobile Application or service. Your IP address is a number that lets computers attached to the Internet know where to send you data -- such as the pages you view. We automatically receive and log information from your browser, including your IP address, your computer's name, your operating system, browser type and version, CPU speed and connection speed. We may also collect log information from your device, including your location, IP address, your device's name, device's serial number

or unique identification number (e.g. UDID on your iOS device), your device operating system, browser type and version, CPU speed, and connection speed etc.

9. We may receive information about you from other sources, add it to our account information and treat it in accordance with this Privacy Policy. If you provide information to the platform provider or other partner, whom we provide services, your account information and order information may be passed on to us. We may obtain updated contact information from third parties in order to correct our records and fulfil the services or to communicate with you.
10. The Website or Mobile Application may include links to other websites or Mobile Applications. Such websites or Mobile Applications are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the Mobile Application, you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from the Mobile Application's homepage, you should contact the Mobile Application or website owners directly for more information. When we present information to our advertisers -- to help them understand our audience and confirm the value of advertising on our Websites or Mobile Applications -- it is usually in the form of aggregated statistics on traffic to various pages / content within our Websites or Mobile Applications. We use third-party advertising companies to serve ads when you visit our Websites or Mobile Applications. These companies may use information (not including your name, address, email address or telephone number or other personally identifiable information) about your visits to this and other Websites or Mobile Application, in order to provide advertisements about goods and services of interest to you. We do not provide any Personally Information to third party websites/ advertisers/ ad-servers without your consent, except in the circumstance mentioned in below clause.
11. We take utmost care our user's Personal Information and/or Sensitive Personal information and we share user's personal information with our employees and third-party facilities providers on strictly on a "need to know" basis hence we take all such steps to ensure that electronic records are valid under the Information Technology Act, 2000 as amended from time to time and notifications and rules framed thereunder.
12. Dvara may share the sensitive Personal Information to any third party/Service Provider/Alliance Partner without obtaining the prior consent of the User in the following limited circumstances:
 - i. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences.
 - ii. Dvara proposes to share such information within its group companies and officers and employees of such group companies and/or third party service provider for the purpose of processing Personal Information on its behalf.

- iii. Dvara may use third-party advertising companies and/or within group companies to serve ads when the User's visits the Website. These companies may use Personal Information about the User's visit to the Website and other websites in order to provide advertisements about goods and services of interest to the User.
 - iv. Dvara shall transfer information about the User in case Dvara is acquired by or merged with another Dvara.
 - v. Dvara may share the personal information with the Service Provider, in case the User shows interest in Applying for User.
13. As Per PMLA (Prevention of Money Laundering Act 2002) guidelines and Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 records need to be maintain for a period of up to 10 years from the closer / deletion of account. In the event of any legal / regulatory proceeding is the pending we can retain records for a longer period as may be asked by regulatory / statutory authorities.
14. We take Appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. ALL INFORMATION GATHERED ON DVARA IS SECURELY STORED WITHIN DVARA CONTROLLED DATABASE. THE DATABASE IS STORED ON SERVERS SECURED BEHIND A FIREWALL; ACCESS TO THE SERVERS IS PASSWORD-PROTECTED AND IS STRICTLY LIMITED. HOWEVER, AS EFFECTIVE AS OUR SECURITY MEASURES ARE, NO SECURITY SYSTEM IS IMPENETRABLE. WE CANNOT GUARANTEE THE SECURITY OF OUR DATABASE, NOR CAN WE GUARANTEE THAT INFORMATION YOU SUPPLY WILL NOT BE INTERCEPTED WHILE BEING TRANSMITTED TO US OVER THE INTERNET. AND, OF COURSE, ANY INFORMATION YOU INCLUDE IN A POSTING TO THE DISCUSSION AREAS IS AVAILABLE TO ANYONE WITH INTERNET ACCESS.