

**Kshema General Insurance Limited**

**Consent Notice Policy**

kshema

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## Consent Notice Policy

### 1. Introduction

We, Kshema General Insurance Limited, are committed to protect any personal information that we may receive and/or collect while you access our platform. We believe it is important for you to know, how we treat information about you that we may receive when you engage with us.

### 2. Definitions

**“automated”** means any digital process capable of operating automatically in response to instructions given or otherwise for the purpose of processing data.

**“cookies”** are small files that are placed on Your computer, mobile device, or any other device by a Platform for record-keeping purposes. These are also known as browser cookies or tracking cookies, they are small, often encrypted text files, located in the browser of Your device(s).

**“consent notice policy”** means this Policy.

**“data”** means a representation of information, facts, concepts, opinions, or instructions in a manner suitable for communication, interpretation or processing by human beings or by automated means.

**“Kshema”** or **“Company”** or **“us”** or **“we”**- refers to Kshema General Insurance Limited.

**“personal data or Information”**- means any data or information about an individual who is identifiable by or in relation to such data.

**“processing”** in relation to personal data, means a wholly or partly automated operation or set of operations performed on digital personal data, and includes operations such as collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.

**“platform”**- refers to website of the Company and/or any mobile application, which is developed and/or owned and/or licensed by Kshema for its services.

**“services”** – all services made available by us through the platform.

**“you”** or **“your”** or **“user(s)”** means the person(s), including but not limited to, customer, employees, vendor, service providers, contractors etc., visiting and/or accessing and/or using the platform in any capacity.

### 3. Applicability

This Policy is applicable to all users/visitors/viewers/employees/contractors/vendors/service providers etc., of the platform. This statement and the Policy outlined herein are not intended to and do not create any contractual or financial or any other legal rights in favour of any users.

Please read this Policy carefully. By using any of the services, you represent that you have read and understood the terms and conditions of usage, by giving your consent to process

your data and/or personal data, and you agree to be bound by all the terms as outlined in this policy.

## 4. Processing Personal Information/Data

### Storage

All data including personal information collected by us from you or otherwise will be transferred and stored in secure servers of the Company and/or in servers leased and/or licensed by the Company for any duration. The Company may at its discretion and/or requirement keep copies of such data and information at multiple locations and/or on the Company's main servers for processing of the said information and data. You hereby grant your consent to the storage, processing, and application and/or use of your personal data and/or information received by the Company including through use of cookies.

We receive both information that is directly provided to us by you or received through lawful means, when you visit the platform, and information that is passively or automatically collected from you.

### Data collection & requirement

To avail the services, we may require and collect some of these personal Information and you give your consent to process, store, collect and transfer the information such as name, address, e-mail address, telephone number, age, gender, Aadhaar number, Aadhaar identifier or business details or biometric information, password, financial details such as bank name, account number and any other document which is required to comply with KYC norms. We may collect your real time location data, if required for the purpose of services. We may also collect your data through survey and feedback forms.

The other automatically collected information may include:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and any other platform, search preferences, service preferences, etc., and any other information that may generally be collected during use of the services including while accessing the platform-based services of the Company;

Information about your visit, including the full Uniform Resource Locators (url), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call the Company's customer service number, etc.

The Company will store small text files called cookies in your device to enable various features of our platform. These are used to store user preferences and trends to improve user/viewer experience. You have the option to change your browser settings to accept or not accept cookies and depending on what you agree to our use of any information collected by us through that cookie. Any such information collected through cookies will only be used for improving the platform experience and/or to deliver the services.

The Company or its service providers may also use "web beacons" or clear GIFs, or similar technologies, which are small pieces of code placed on the platform or in an email, to monitor the behavior and collect data about the users viewing the platform.

IP addresses help us customise your visit to the platform since they are tied to personally identifiable information. We confirm that this information is not shared with third parties, for their promotional purposes, except as provided under this Policy. When you download or use our platform, we also collect various device specific details like device ID and device accounts including third-party accounts or MAC-address. This data is used to resolve technical difficulties and to provide you with the correct and most recent version of the platform.

When you download or use the platform, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. If you wish to opt out of location services, You may do by changing your mobile phone settings.

You hereby grant your consent to the storage and processing of your personal data and/or information received by the Company including through use of cookies.

## 5. Use and disclosure of Personal Information/Data

The data and/or personal information collected or received from you may be used by us for certain lawful purposes connected with our business operations, functions, and provision of the services, which include but are not limited to:

- Provide and maintain services, including to monitor the usage of services and to provide tailor made services and/or to improve existing services.
- In the normal course of business to enforce the terms and conditions of services
- Contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- Send you periodic communications (this may include e-mail), about features, products and services, events and special offers. Such communications from us may include promotion of programs being organized by third parties on our platform.
- Provide You with news, exclusive offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- Attend and manage your requests to us, while dealing with requests, enquiries or complaints and other customer care related activities and all other general administrative and business purposes
- We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our services is among the assets transferred.
- We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, advertising and to evaluate and improve our services, marketing, and your experience.
- Verification of your identity as per prevalent laws and regulation.

- Performance of outsourced non-core activities as defined under the IRDAI guidelines.
- Sharing with reinsurers who may have offices located outside India.
- Protect, enforce and defend our rights or property.
- Prevent or investigate possible wrongdoing in connection with the services.
- Protect the personal safety of users of the services or the public.
- Provide technical support for the platform in connection with the services.
- Prevent fraud or potentially illegal activities (including, without limitation, copyright infringement) on or through the platform or services.
- Protect the safety of our other subscribers or users.
- We may share the user information with our affiliates or group companies, so they can provide, improve, and communicate with you about their own, or their marketing partners' products and services.
- Address network integrity and security issues.
- Carrying out any activity in connection with a legal, governmental or regulatory requirement, for the purpose of compliance of a legal obligation, in connection with legal proceedings, in connection with prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, protect and defend our rights or property or act in an emergency to protect safety or to help investigations, monitor or prevent or take action regarding unlawful and illegal activities/suspected fraud/potential threat to the safety or security of any person.
- Conducting activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer.
- The information may be processed by the Company's staff, third parties, suppliers, service providers, partners, agents etc., subject to confidentiality obligations and restrictions.
- For the safety and security of our employees and services providers and for optimizing workforce management by ensuring timely completion of tasks and/or for tracking work hours and activities as to identify areas for improvement and enhance productivity in accordance with the contractual obligations, if any.

You hereby grant your consent to the use and disclosure of your personal data and/or information received by the Company for the above-mentioned purposes.

You may inform us at any time, not to share your personal information with third parties by sending us an e-mail or message at [info@kshema.co](mailto:info@kshema.co).

## 6. Consent for Aadhaar Number based KYC

By sharing your Aadhaar number, you hereby consent to the Company's collection, usage and storage of your Aadhaar number, Virtual ID, e-Aadhaar, XML copy, Masked Aadhaar, demographic information, identity information, Aadhaar registered mobile number, Aadhaar registered address, date of birth; as per applicable laws/regulations (may collectively be known as - "Aadhaar Information") for the following purposes:

- KYC and any related processes for the purpose of establishing your identity using Aadhaar information by authentication / verification / identification as per the acceptable regulatory laws for the provisioning of services.
- Collecting, sharing, storing, preserving Aadhaar Information, maintaining records and using the Aadhaar Information and authentication / verification / identification records

for the informed purposes above as well as for regulatory and legal reporting and filings and/or where required as per the applicable laws.

## 7. Consent for downloading the record from Central Know Your Customer Record Registry (“CKYCR”)

To comply with regulatory requirements, we, reporting entity, are required to upload your KYC information, once you become our customer, on CKYCR Portal to generate the KYC identifier, which is a unique 14-digit number. If you already KYC Identifier numbers, you consent to us to download records from CKYCR for the purpose meeting regulatory requirements.

## 8. Right to control your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- You have the right to know what information we hold about you. You may also request details about the categories of data collected, the purpose of processing, and who it's shared with. We, however, have already disclosed, the usage of your information, in this Policy, we will still provide clear and accessible explanations.
- You may request correction of any inaccurate or incomplete personal data. If you find errors in your records, you may write to us and get your information corrected.
- You have the right to request deletion of your personal data. However, exceptions may apply for legal or public interest reasons.
- You also have right to restrict how we process your data. You may limit the purposes for which your data can be used or the entities who can access it. However, exceptions may apply for legal or public interest reasons.
- You have the right to receive your personal data from us in a structured and machine-readable format, should you wish to transfer it to another service provider.
- You have the right to withdraw your consent for data processing at any time but before entering an insurance contract.
- You have the right to lodge a complaint with the Data Protection Board of India if you believe your data rights have been violated. We assure you that we are duty bound to comply with the Digital Personal Data Protection Act and be accountable for your data.

You may exercise your rights by writing to us at [info@kshema.co](mailto:info@kshema.co).

## 9. Security of Your Personal Data

The security of your personal data is important to us. We will implement the security practices, procedures, principles and standards in line with the best practices, standards and prevailing regulations around information security in compliance.

We can your data encrypted both in transit and at rest, however, any transmission of data over internet is not completely secured and hence, we do not guarantee the security of the data transmitted via internet. The Company will take all reasonable steps and measures to keep all data and information received by it, secured and protected as required under the laws of India, however the Company does not assume any responsibility or liability for data and/or information transmitted through use of any electronic means including internet, phones, emails etc. and such transmission is at your own risk.



It is cautioned that you choose your passwords carefully such that no unauthorized access is made by another person. To make the password difficult and complex for others to guess, You may choose a combinations of alphabets, numbers, special characters like \$, #, @, \* etc. Do not share your username and password to anyone and maintain the absolute confidentiality of your login credentials.

Your data will be processed and accessed by those who are needed to know such information for the purpose of providing services and it will in accordance with the Company's policy on data protection and information sharing. We also conduct periodical trainings to aware and educate our employees on best data security practices.

We endeavor to protect your data from any malware or cyber-attack by implementing required tools such as firewalls, intrusion detection devices etc.

We also conduct periodical security audits and assessments, as requirement by regulator, to identify vulnerabilities and weakness in the data handling processes.

We have in place the incident response procedure as per the regulatory requirements.

## **10. Linked Services**

Our platform may contain links to or integrations with other services and platforms whose information practices may be different than ours. You should consult these other services' privacy notices or consent notices as we have no control over information that is submitted to, or collected by, these third parties. It is also clarified here that we do not have any control over collection, usage and storage of your information, which you give while visiting or browsing those websites and nor we take any responsibility of any information provided on their websites. It is cautioned that User must read and understand their privacy policies.

## **11. Retention of Your Personal Data**

We will retain your personal data only for as long as is necessary for the purposes set out in this Policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will collect financial information such as credit card number and expiration date through the payment gateway of the credit card company or the internet banking service of your bank, but we do not store this information in our database.

We also retain usage data for internal analysis purposes after anonymizing and removing all linkages with user. Usage data is retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **12. Acceptance of the Policy**

By visiting our platform, signing up or logging into, updating information on the platform and availing our services, you acknowledge and unconditionally accept this Policy.

## **13. Change of Policy/ Updates**

We may change or alter, modify, add to, or remove any portion of this Policy from time to time

on the sole discretion of the Company and you should check the Policy every time you visit our platform.

Your use of the platform will be deemed an acceptance of the Policy existing at that time.

#### **14. Grievance Officer**

While, we will strive to ensure you do not have any grievance, should you still have any, you may address the same to the Grievance Officer, whose contact details is furnished below.

Name: Mr. Narendra Nadella  
Designation: Grievance Officer  
Contact e-mail: narendra@kshema.co

#### **15. Disclaimer and Assurance**

Information, content, and materials provided on the platform are on an “As Is” basis and we do not make any express or implied representation or warranty regarding the accuracy or completeness of the same.

We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so.

