

## Privacy Policy | Fello

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Hello!

We at Fello Technologies Private Limited (“we”, “us”, “our”, or “Company”) take your privacy seriously. We are committed to safeguard your interest and want to keep you updated, at all times, about how we collect and use your data.

**What is this document?** This document is our privacy policy (“Privacy Policy”). It sets out how we collect, process, store, and share your data when you access or use the Fello Platform.

**Why is it important?** This Privacy Policy gives you visibility over your data. It explains what we can do with it and how. We will not use or share any of your information except as described here.

**Is this part of the Terms?** Yes. This Privacy Policy is a part of the Terms you have agreed with us here: [\[please insert link\]](#). Words used in this policy will have the same meaning given to them in

**Can this Privacy Policy change?** Yes. We may revise this policy, update the Fello Platform, or change our services at any time. So, please check this policy regularly as it is binding on you.

### 1. THE INFORMATION WE COLLECT AND HOW WE USE IT

By accessing or using the Fello Platform, you consent to providing us your data and agree to our data collection and handling practices. This table lists the information and documents we collect from you and how we use it:

What data do we collect	Why we collect it
<b>Registration and login data:</b> Your name, mobile number, email, user-id, password, bank account details, or any information we ask you on the Fello Platform.	<ul style="list-style-type: none"><li>▪ To set-up your account on the Fello Platform and facilitate login;</li><li>▪ To notify you about new products, discounts, and promotional offers;</li></ul>
<b>Log Data:</b> Information we automatically collect when you use the Fello Platform, whether through the use of cookies, web beacons, log files, scripts, or any other information of similar kind.	<ul style="list-style-type: none"><li>▪ To notify you about changes to the Fello Platform, including the Terms and this Privacy Policy;</li><li>▪ To facilitate communication with you, and give customer support;</li><li>▪ To enforce our Terms, our rights, or the</li></ul>

<p><b>Surveys:</b> We may ask you to undertake surveys or fill questionnaires from time to time. Some of these will require you to give us personally identifiable information. These surveys or questionnaires may also be conducted by third-party service providers.</p> <p><b>Device data:</b> Information we collect from the devices you use to access or operate the Fello Platform. This includes, without limitation, information about your device attributes and identifiers, plugins, name of your mobile operator or ISP, SMS, device language, time zone, IP address, connection speed, device applications, contact list, or any information available on such device.</p>	<p>rights of our partner AMC or Gold Suppliers;</p> <ul style="list-style-type: none"> <li>▪ To develop new services, improve the existing services on the Fello Platform, and integrate user preferences, feedbacks, and requests.</li> <li>▪ To administer the Fello Platform and facilitate internal operations, including but not limited to, troubleshooting, data analysis, testing, research, security, and fraud-detection;</li> <li>▪ To better understand how you use and access the Fello Platform and to improve your user experience;</li> <li>▪ To assess effectiveness of and improve advertising and other marketing and promotional activities;</li> <li>▪ To make your device compatible with the Fello Platform;</li> <li>▪ To customize and optimize your user experience on the Fello Platform.</li> </ul>
<p><b>Financial information:</b> This includes your bank account details, UPI-id, credit and debit card information, details regarding your payment wallets or other payment instruments.</p>	<ul style="list-style-type: none"> <li>▪ To enable you to pay and process funds to our partner AMC or Gold Supplier;</li> <li>▪ To disburse and distribute Rewards to your bank account;</li> <li>▪ To facilitate payment from our partner AMC or Gold Supplier when you redeem or sell any financial product through the Fello Platform.</li> </ul>
<p><b>Customer support data:</b> Any information that you provide to our customer support team or our grievance redressal officer from time to time.</p>	<ul style="list-style-type: none"> <li>▪ To investigate your support issue and assist you in resolving your query;</li> <li>▪ To internally help us in improving and developing our user support systems;</li> <li>▪ To pass on relevant queries from users to our partner AMC or Gold Supplier.</li> </ul>
<p><b>Location data:</b> Information that we derive from your device or from the address details you provide us while using the Fello Platform.</p>	<ul style="list-style-type: none"> <li>▪ For security, fraud-detection and account management;</li> <li>▪ To provide you with location customization;</li> <li>▪ To detect if you are operating from a state where the use of our services or the Fello Platform is prohibited.</li> </ul>

<p><b>KYC data:</b> We will ask you for such documents and information that help us do your KYC verification, such as: PAN card; Aadhar card; occupation details; salary bracket; bank account details, or any other information or document needed for KYC verification.</p>	<ul style="list-style-type: none"> <li>▪ To analyze your credit worthiness, risk appetite, and curate financial products for you;</li> <li>▪ To help our partner AMC and Gold Supplier verify your KYC with the use of third-party service providers.</li> </ul>
<p><b>Transactional data:</b> We collect transaction information related to your use of the Fello Platform and our services, including the type of financial product you subscribe to, date and time of such subscription, amount of saving and investment, rate of interest, and any other information that relates to your saving and investment.</p>	<ul style="list-style-type: none"> <li>▪ To enable the Fello Platform and facilitation of our service;</li> <li>▪ To curate better financial products for you;</li> <li>▪ To adhere to our agreement with the partner AMC and Gold Supplier, and comply with applicable law.</li> </ul>

## 2. DISCLOSURE OF YOUR INFORMATION

- 2.1. *Sharing with service providers:* We work with third party service providers to execute various functionalities of the Fello Platform and we may share your information with such service providers to enable our services.
- 2.2. *Sharing with partner AMC/Gold Supplier:* We will share your KYC data and financial information with our partner AMC/Gold Supplier and their respective service providers. This helps the AMC/Gold Supplier to ensure your KYC compliance, aid in the delivery and servicing of financial products, and enables them to disburse funds upon redemption.
- 2.3. *Sharing with B2B partners:* We partner with businesses to sponsor the Rewards and advertise relevant products to you. We share such information with these businesses that helps them to give you these Rewards and show you user-specific advertisements.
- 2.4. *Sharing with group companies:* Subject to applicable law, we may share any data we collect from you with our group companies for: product research and development, make our services better, and tailor the products for your benefit.
- 2.5. *Sharing with law enforcement when needed:* We will share your information, without prior notice, on a request from any governmental authority or law enforcement officers that we find appropriate or necessary in order to comply with applicable law.

## 3. OUR DATA SECURITY PRACTICES

- 3.1. *How we ensure security:* We have in place appropriate technical and security measures to secure the information collected by us. We use the servers of third-party service providers to protect the information you provide us.
- 3.2. *How you should ensure security:* You are responsible to keep the user credentials for accessing the Fello Platform personal and confidential. You should not share your password or login details with anyone. We will not be responsible for any liability or obligation you might face due to your sharing of account details with anyone.
- 3.3. *Disclaimer:* Transmission of information via. the internet is not completely secure. We will do our best to protect your data, information and documents but we cannot guarantee the security absolutely. Any information you provide us is at your own risk

and discretion. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

#### **4. OUR DATA RETENTION PRACTICES**

- 4.1. We may retain the information you provide us to facilitate smooth and uninterrupted use of the Fello Platform, facilitate our partner AMC and Gold Suppliers to service you, or to comply with applicable laws (or our agreement with partner AMC/Gold Supplier) that require us to hold your information for a specified time.
- 4.2. We do not retain your information longer than required. For any other information, we will entertain your request for deletion, however, this might affect your smooth and uninterrupted use of our services.

#### **5. YOUR RIGHTS**

- 5.1. You are free to remove or delete content from your Fello account at any point of time, subject to the Terms, this Privacy Policy, and applicable law.
- 5.2. You may amend, add or delete your information from your Fello account at any time by logging in and visiting your profile page. As noted above, you may opt out of receiving marketing and promotional email communications from us. However, you will continue to receive necessary transactional emails until your account is deleted.
- 5.3. You have a right to ask us to review, correct and amend the information we collect about you at any point in time. You also have the right to revoke your consent to the collection of your information going forward. We will entertain such requests to the extent they do not disrupt your obligation under the Terms. However, please note that revoking your consent may negatively affect your use of the Fello Platform.
- 5.4. You can exercise any of these rights at any time by contacting us at [manish@fello.in](mailto:manish@fello.in). However, we require a reasonable period to comply with any of your requests.

#### **6. THIRD PARTY LINKS**

- 6.1. The Fello Platform may contain references and links to third party websites and products in such websites. However, we are not liable in any manner, whatsoever, for any content as may be displayed on such third-party websites.
- 6.2. If you follow a link to any of these websites, please note that these websites have their own privacy policies, terms of use and cookie policies that we do not accept any responsibility or liability for. Please check these documents before you submit any information to these websites, mobile applications or their own affiliates.

#### **7. COMMUNICATIONS FROM US**

- 7.1. We may from time to time send you service-related announcements when we consider it necessary to do so (such as when we temporarily suspend the Fello Platform for maintenance, or security, privacy, or administrative-related communications). We will send these to you via SMS or/and emails.
- 7.2. You may not opt-out of these service-related announcements, which are not promotional in nature and used solely to protect your account and keep you informed of important changes to the Fello Platform.

#### **8. GRIEVANCE OFFICER**

We have a Grievance Officer to address your concerns regarding data safety, privacy, and your usage of the Fello Platform. We will resolve the issues raised by you within 30 (thirty) days from receiving them. You may contact our Grievance Officer using these coordinates:

Name: Manish Maryada

Address: Hanto, 14th Main St, opp. Max, Bengaluru, Karnataka 560102

Office hours: 10 am - 7pm (Monday to Friday)

Email: [manish@fello.in](mailto:manish@fello.in)

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