



Privacy Policy



DOCUMENT AND RECORD CONTROL

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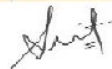
Release Authorization

Task	Name	Title
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Reviewer Authorization

Task	Name	Title
Reviewed By	Mr. Prateek Kumar Mishra	Manager – Internal Audit

Policy Approver Authorization

Name	Title	Signature	Date
Mr. Sumit Ranjan	Head - Process & Policy		23-May-2022

Board Approval Authorization

Name	Title	Signature	Date
Mr. Dev Verma	Director		23-May-2022
Mr. Dev Verma	Managing Director & CEO		12-December-2024

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Introduction

Swara Fincare Limited is committed to respecting your online privacy and recognizes the need for appropriate protection and management of any personally identifiable information ("Personal Information") you share with us.

Swara has established this online Privacy Policy so that you can understand the care with which we intend to treat your Personal Information.

This privacy policy has been drafted keeping in view that reasonable security practices and procedures are implemented and enforced at all times in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

This Policy shall be governed by and construed in accordance with the laws of India. The courts at New Delhi, India shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.

Personal Information

Personal Information means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address, an e-mail address, phone number, or other contact information, whether at work or at home.

In general, you can visit Swara's web pages without telling us who you are or revealing any Personal Information about yourself. If you choose to provide us with your Personal Information on the web, we may transfer that information, within Swara or to Swara's third party service providers, partners, or resellers, across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Swara strives to comply with all applicable laws around the globe that are designed to protect your privacy.

Purpose of collection and use of Personal Information

Personal information will be collected on Company's website (www.swarafincare.com) and received via email by the Company. The Company may collect, store, access, and use Personal Information solely to the extent required for Company for accessing credibility of customers for the purpose of Swara services.

The Company shall not publish, sell, give on rent, trade, or otherwise transfer Personal Information to third parties, except as may be required by law, or pursuant to the order of a court or regulatory authority, or in order for the Company to enforce its rights, or expressly permitted by clients/customers or as expressly stated by this Policy.

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to: (a) improve your browsing experience by personalizing our website; (b) send information to you which we think may be of interest to you by post, email, or other means, and (c) send you marketing communications relating to our business. We may, from time to time, contact you regarding a particular offering that may be of interest to you.



Cookies and other Navigation Tracking Technologies

Cookies Policies: Some of our web pages utilize "cookies" and other navigation tracking technology. A "cookie" is a small text file that may be used, for example, to collect information about web site activity. Some cookies and related technology may serve to recall Personal Information previously indicated by a web user.

Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie or you may choose to block cookies with your browser.

Use of Navigational Information: We may use Navigational Information to operate and improve our website. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about Swara.

Tracking technologies: Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses, browser software and operating system types, clickstream patterns, and dates and times that our site is accessed. Our use of cookies and other tracking technologies allows us to improve our web site and your web experience. We may also analyse information that does not contain Personal Information for trends and statistics.

Information Security

Swara Fincare Limited takes reasonable steps to protect your personally identifiable information as you transmit your information from your computer to our site and to protect such information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction.

The Company shall take all reasonable precautions by way of using current industry standard technologies such as archiving mails and storing them with 128-bit encryption to protect personal information from loss, misuse and unauthorized access, disclosure, alteration, and destruction.

While using the Website, the Customers accept the inherent security implications of data transmission over the internet and the World Wide Web cannot always be guaranteed as completely secure. Therefore, the use of the Website will be at the own risk of the Customers.

Swara Fincare assumes no liability for any disclosure of information due to errors in transmission, unauthorised third-party access, or other acts of third parties, or acts or omissions beyond its reasonable control and the customers agrees not to hold Swara Fincare responsible for any breach of security unless such breach has been caused as a direct result of gross negligence or wilful default by Swara.

Third Party Services

Third parties provide certain services on Swara's behalf. Swara may provide information, including Personal Information that you have provided to Swara or that Swara collects about you through social media identifiers such as LinkedIn or Twitter, to third party service providers, including partners and resellers, to help us deliver programs, products, information, and services. Service providers are also an important means by which Swara maintains its web site and mailing lists. Swara will take reasonable steps to ensure that these third-party service providers are obligated to protect Personal Information



on Swara's behalf. Swara does not intend to transfer Personal Information without your consent to third parties who are not bound to act on Swara's behalf unless such transfer is legally required.

Notice

Where Swara collects Personal Information online, we intend to post a purpose statement that explains why Personal Information will be collected and whether we plan to share such Personal Information outside of Swara or those working on Swara's behalf. We do not intend to transfer Personal Information without your consent to third parties service providers, partners or resellers of the Company, who are not bound to act on Swara's behalf unless such transfer is legally required.

Choice

The Company reasonably presumes that Clients who make available Personal Information to Company are doing so out of their own volition. Company does not compel Clients to disclose their Personal Information.

By using this web site, your consent to the terms of our online Privacy Policy and to Swara's processing of Personal Information for the purposes detailed above as well as those explained where Swara collects Personal Information on the web. Each time you provide personally identifiable data you will be informed on the form or link regarding data that we will record and will be given an opportunity to provide your Consent or withhold it.

Customer Testimonials and Comments

We occasionally post customer testimonials and comments on our websites, which may contain Personal Information. In such cases we obtain each customer's consent via email prior to posting any testimonials.

Data Access/Data Accuracy

To the extent that you do provide us with Personal Information, Swara wishes to maintain accurate Personal Information. We may periodically send out communication to check the accuracy of the information we hold about you. Where we collect Personal Information from you on the web, our goal is to provide a means of contacting Swara should you need to update or correct that Information. If for any reason those means are unavailable or inaccessible, you may send updates and corrections about your Personal Information via Email to us, at privacy@swara.com. You may also instruct us to erase all personally identifiable information about you on our records.

Legitimate Interests

Under the General Data Protection Regulation certain categories of personal data processed by Swara falls under 'legitimate interests'. Swara occasionally may reach out to business-to-business contacts for marketing related data processing under such a Legitimate Interests category based on the following assessments:

Purpose test: Swara as a commercial entity has a legitimate interest in promoting its products and services and also to occasionally publish related offers to business contacts, which it may do through direct marketing.



Necessity test: Swara may, in cases where assessments have demonstrated that direct marketing is the most effective manner, follow email and other forms of marketing to promote its business. In such cases this processing will be solely restricted to the processing of Business-to-Business (B2B) contacts. Swara will not use direct marketing with non-B2B contacts.

Balancing test: Swara will only use direct marketing for occasional business-to-business marketing, to business personnel with decision making / influencing / budgetary responsibilities in a business context who we believe in their roles will reasonably expect to be contacted with marketing material relating to his / her professional role.

In all cases, while we do not anticipate any of our direct marketing to be objectionable, recipients will always have the option to unsubscribe from updates in which case once such communication has been received, Swara will move related records to a restricted Do Not Contact database. In no manner and at any point will Swara engage in direct marketing activities that does not comply with the Purpose, Necessity and Balancing purposes outlined above, or will Swara engage in processing activities that we believe may override the rights of Data Subjects. We also do not sell your information to any other parties.

The user rights under the General Data Protection Regulation are mentioned below:

Access: The right to request information about how we process your Personal Information and also to obtain a copy of that Personal Information.

Rectification: The right to request the rectification of inaccurate Personal Information about you and for any incomplete Personal Information about you to be completed.

Objection: The right to object to the processing of your Personal Information, which is based on our legitimate interests (as described above).

Erasure: The right to request the erasure of your Personal Information (subject to certain conditions).

Automated decision-making: The right not to have a decision made about you that is based solely on automated processing.

Restriction: The right to ask us to restrict our processing of your Personal Information.

Portability: The right to receive your Personal Information as per our records in a machine-readable format free of charge. You may direct us to provide this data to a third party which we will do as is technologically reasonable.

Compliance

The Company shall always cooperate with regulatory authorities and investigating agencies in India in the matter of treatment of Personal Information. The Company may modify this Policy in its sole discretion at any time.

The customers who subscribe to our services or newsletters are obligated through our agreements with them to comply with this Privacy Policy.



Commitment

We are committed to maintaining privacy and will support current industry initiatives to preserve individual privacy rights on the Internet. Protecting your privacy on-line is an evolving area, and Swara's websites are constantly evolving to meet these demands. If you have any comments or questions regarding our Online Privacy Policy, please email us at info@swara.com

Disclaimer

In addition to the above, you have the right to lodge a complaint with a supervisory authority if you consider that our processing of your Personal Information infringes applicable data protection law.

Please feel free to direct any questions, comments, or complaints regarding this privacy statement or the privacy practices of Swara Software to our Data Protection Officer:

Swara Fincare Limited

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Phone: 0124-4238016

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