



LRSD SECURITIES PRIVATE LIMITED

WEBSITE PRIVACY POLICY

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Thank you for using <https://www.lrsdindia.com>. This Website is a digital property owned and operated by **LRSD Securities Private Limited** (hereinafter collectively referred to as “Company”, “LRSD”, “we”, “us”, or “our”) which, prescribes this Privacy Policy (the “Privacy Policy”/“Policy”), last updated on the date mentioned above, and describes how we collect, use, and disclose your Personal Information when you visit or use our website <https://www.lrsdindia.com>/(the “Site”), email plugins, chrome extension and any other website or mobile application or plugins that links to this Privacy Policy in Our capacity as a controller of your Personal Information.

This electronic record is generated by a computer system and does not require any physical or digital signatures. By visiting our website or using our services, you are consenting to be bound by this User Agreement. Please ensure that you read and understand all the provisions of this document before you start using <https://www.lrsdindia.com>/, as you shall be bound by all the terms and conditions herein of this electronic contract. If this document is not in a language that you understand, you shall contact the Company at the email admin@lrsdindia.com. By using our services, you are agreeing to be bound by the terms of this Privacy Policy.

IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THIS WEBSITE OR AVAIL ANY OF THE SERVICES BEING PROVIDED THEREIN.

This Privacy Policy explains what information of yours will be collected when you visit the website or access the Services provided herein, how such Personal Information will be used, and how you can control the collection, correction, and/or deletion of your Personal Information. We will not use or share your Personal Information with anyone except as described in this Privacy Policy. The use of information collected through our Sites shall be limited to the purposes under this Privacy Policy and our Terms of Service (the “Terms”) to customers. Capitalised terms not specifically defined herein shall have the same meaning as ascribed to them in the Terms.

Supplemental clauses in the privacy policy or documents that may be posted on the Site from time to time are hereby expressly incorporated herein by reference. We reserve the right, in our sole discretion, to make changes or modifications to the Privacy Policy from time to time. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy, and you waive any right to receive specific notice of each such change. Please ensure that you check the applicable Terms of Privacy Policy every time you use our Site so that you understand which Terms apply. You will be subject to,

and will be deemed to have been made aware of and to have accepted, the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at admin@lrsdindia.com.

SUMMARY OF KEY POINTS

What personal information do we process? When you visit, use, or navigate our website, we may process personal information depending on how you interact with the Company and the Services, the choices you make, and the products you use.

Do we process any sensitive personal information? We may process sensitive personal information, when necessary, with your consent or as otherwise permitted by applicable law.

Do we receive any information from third parties? We may receive information from public databases, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do I exercise my rights? The easiest way to exercise your rights is by sending an email to us at: admin@lrsdindia.com. We will consider and act upon any request by applicable data protection laws.

1. Overview of the Policy

This Privacy Policy applies to the Users of the Company services anywhere in India, including the Users of its features and other services. This Privacy Policy describes how the Company collects and uses your personal data.

<https://www.lrsdindia.com/> is a digital property owned and operated by the Company. We are committed to protecting and respecting your privacy. We do collect your personal information and process your personal data in accordance with the Information Technology Act, 2000 (also known as ITA-2000, or the IT Act), Digital Personal Data Protection Act, 2023 (DPDP Act), and its associated rules and other national and state laws that relate the processing of your personal data.

We collect your information in order to provide and continually improve our and host's services. Our Privacy Policy is subject to change at any time without notice, to make sure you are aware of any changes, please review this Policy periodically. All the Independent Partners, who are working with or for us, or who have access to personal information, will be expected to read and comply with this Policy. No third party may access, or process sensitive personal information held by us without having first entered into a Confidentiality Obligation.

As a Non-Banking Financial Company regulated by the Reserve Bank of India, the Company is committed to maintaining the confidentiality, integrity, and security of customer information in accordance with applicable regulatory requirements.

2. Definitions & Interpretations

2.1. For the purposes of this Privacy Policy:

2.1.1. "Account" means an account created for you to access our Financial Services or parts of our Service.

2.1.2. "Business", refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Customers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of customers' personal information, that does business.

2.1.3. "Company" (referred to as either "the Company", "We", "Us" or "Our" or 'LRSD' in this Agreement) refers to LRSD Securities Private Limited.

2.1.4. “Country” refers to India.

2.1.5. “Cookies” are small files that are placed on your computer, mobile device, or any other device by a website, containing the details of Your browsing history on that website among its many uses.

2.1.6. “Device” means any device that can access the Service such as a computer, a cell phone, or a digital tablet.

2.1.7. “Personal Data” is any information that relates to an identified or identifiable individual. It means any information relating to You such as a name, an identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity.

2.1.8. “Service” refers to the Lending or financial services available and offered by the Company.

2.1.9. “Usage Data” refers to data collected automatically, either generated by the use of the Website or Service or from the Website or Service infrastructure itself (for example, the duration of a page visit).

2.1.10. “Website” refers to <https://www.lrsdindia.com/>.

2.1.11. “You” means the Individual, Company, Group, Organization, or Entity that is accessing, using, or providing the Services, or the company, or other legal entity on behalf of which such individual is accessing or using or providing the Services, as applicable.

3. Collection of your Personal Data

3.1. Personal Data: While using Our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

3.1.1. Email address

3.1.2. First name and last name

3.1.3. Phone number

3.1.4. Address, State, Province, ZIP/Postal code, City

3.1.5. Usage Data

3.2. Usage Data:

3.2.1 Usage Data is collected automatically when using the Website or Service.

- 3.2.2 Usage Data may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our website or Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- 3.2.3 When You access the Website or Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.
- 3.2.4 We may also collect information that Your browser sends whenever You visit our website or Service or when You access it by or through a mobile device.

4. Sources of Personal Information

- 4.1. We obtain the categories of personal information listed above from the following categories of sources:
 - 4.1.1. Directly from You. For example, from the forms You complete on our website or Service, preferences You express or provide through our Service, or from Your availing of Service.
 - 4.1.2. Indirectly from You. For example, from observing Your activity on our Lending or other financial services.
 - 4.1.3. Automatically from You. For example, through cookies We or our Service Providers set on Your Device as You navigate through our Service.
 - 4.1.4. From Service Providers. For example, third-party vendors to monitor and analyse the use of our Service, third-party vendors for payment processing, or other third-party vendors that We use to provide the Service to You.

5. Use of your Personal Data

- 5.1. We may use Personal Data for the following purposes:
 - 5.1.1. To provide and maintain our Service, including monitoring the usage of our Service.
 - 5.1.2. To contact You: To 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.

- 5.1.3. To provide You with news, and general information about other services, and events that we offer that are similar to those that you have already avail or enquired about unless You have opted not to receive such information.
- 5.1.4. To manage Your requests: To attend and manage Your requests to Us.
- 5.1.5. For business transfers: 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 Service users is among the assets transferred.
- 5.1.6. For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our campaigns, and evaluating and improving our Service, products, services, marketing, and your experience.
- 5.1.7. For Regulatory and Statutory Compliance: We may process and use Your Personal Data for complying with applicable laws, regulations, regulatory guidelines, directions, circulars, and requirements issued by the Reserve Bank of India (RBI), Financial Intelligence Unit-India (FIU-IND), Credit Information Companies (CICs), Central KYC Records Registry (CKYCR), CERSAI, and other competent governmental or regulatory authorities.
- 5.2. The Company may use the information collected to communicate with you about products, services, promotions, studies, surveys, news, updates, and events. The Company may also request your feedback on the Services.
- 5.3. We may use your information for any other purpose disclosed to you at the time we collect or receive the information, or otherwise with your consent.

6. Retention of your Personal Data

- 6.1. The Company retains the Personal Information collected where an ongoing legitimate business requires the retention of such Personal Information. In the absence of a need to retain

your Personal Information as specified herein, we will either delete or aggregate your Personal Information or, if this is not possible then We will securely store your Personal Information and isolate it from any further processing until deletion is possible.

- 6.2. We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.
- 6.3. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, 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 periods.
- 6.4. The Company shall retain customer information, records, documents, and Personal Data for such period as may be prescribed under applicable laws including but not limited to the Reserve Bank of India Act, 1934, Prevention of Money Laundering Act, 2002, applicable KYC Directions, Income Tax laws, Companies Act, 2013, and other statutory or regulatory requirements.

7. Storage, Protection, and Transfer of Your Data

- 7.1. Customer financial data, transaction records, and KYC information shall be stored on servers located within India in accordance with applicable RBI guidelines. Other non-financial data may be stored or processed outside India subject to applicable legal requirements and adequate safeguards.
- 7.2. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.
- 7.3. We will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.
- 7.4. We take due care to protect Users' data. Technical measures are in place to prevent unauthorized access to data and against accidental loss or destruction of, or damage to, data. The employees who are dealing with the data have been trained to protect the data from any illegal or unauthorized usage.

7.5. We take reasonable steps to help protect your personal information in an effort to prevent the loss, misuse, and unauthorized access, disclosure alteration and destruction. It is your responsibility to protect your usernames and password, if any, to help prevent anyone from accessing or abusing your accounts and services.

7.6. The Company maintains appropriate administrative, technical, and physical safeguards to protect Personal Data against unauthorized access, disclosure, alteration, loss, misuse, or destruction. Access to customer information is restricted on a need-to-know basis and subject to confidentiality obligations.

7.7. In the event of any Personal Data breach or cybersecurity incident affecting customer information, the Company shall take appropriate remedial measures and comply with applicable legal and regulatory reporting obligations.

In the event of a Personal Data breach, the Company shall intimate the Data Protection Board of India and affected Data Principals without delay, and submit a detailed report to the Board within 72 hours of becoming aware of the breach, in accordance with Section 8(6) of the DPDP Act, 2023.

8. Legal Basis

8.1. Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which We collect it.

8.2. We will normally collect Personal Information from you only where it is needed to perform a contract with you, where the processing is in Our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where We have your consent. In some cases, we may also have a legal obligation to collect Personal Information from you. If We process your Personal Information with reliance on your consent, you may withdraw your consent at any time.

8.3. If you have questions or need further information concerning the legal basis on which we collect and use your Personal Information, please contact Us.

9. Cookies & Browsing

9.1. Tracking Technologies and Cookies

9.1.1. We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. The technologies we use may include:

9.1.1.1. Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a cookie is being sent. However, if You do not accept Cookies, you may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse cookies, our Service may use Cookies.

9.1.1.2. Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

9.1.1.3. Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

9.2. We use both Session and Persistent Cookies for the purposes set out below:

9.2.1. Necessary / Essential Cookies

9.2.1.1. Type: Session Cookies

9.2.1.2. Administered by: Us

9.2.1.3. Purpose: These Cookies are essential to provide You with services through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts.

9.2.2. Cookies Policy / Notice Acceptance Cookies

9.2.2.1. Type: Persistent Cookies

9.2.2.2. Administered by: Us

9.2.2.3. Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

9.2.3. Functionality Cookies

9.2.3.1. Type: Persistent Cookies

9.2.3.2. Administered by: Us

9.2.3.3. Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid having to re-enter your preferences every time You use the Website.

9.2.4. Tracking and Performance Cookies

9.2.4.1. Type: Persistent Cookies

9.2.4.2. Administered by: Third-Parties

9.2.4.3. Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

10. Third-Party Sharing

10.1. We may also share your Personal Information externally with other third-party service providers, which might include, but is not necessarily limited to the companies who provide us with third-party services, business entities, hosts that provide email address management, and communication contact services, network equipment and application management and other service providers which may be involved in the other types of services and activities otherwise discussed in this privacy policy.

10.2. We may also share your Personal Information for the purposes including but not limited to the below:

10.2.1. When you agreed to share: If you are a business customer and agreed to receive the Company marketing communications. Note that we do not share Personal Information about consumers with third parties for their marketing purposes unless the customer agrees to that sharing.

- 10.2.2. When we are required to provide information in response to a subpoena, court order, or other applicable law or legal process.
- 10.2.3. When we have a good faith belief that the disclosure is necessary to prevent or respond to fraud, defend our apps or websites against attacks, or protect the property and safety of the Company, our customers and users, or the public.
- 10.2.4. If we merge with or are acquired by another company, sell the Company, apps, or business units, or if all or a substantial portion of our assets are acquired by another company. In those cases, your information will likely be one of the assets that is transferred.
- 10.3. We display personal testimonials of customers on our Site in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us.
- 10.4. Further, you agree that the Company may transfer the anonymous information we collect in the event of any corporate restructuring or any sale, assignment, or transfer of substantially all of its rights in the Apps.
- 10.5. Some elements on the Site, such as any sponsored links advertising, are supplied to us by third parties under contract. We may supply some of your Personal Information to those third parties including complying with Google API Services, in case you have any query regarding the removal and/or deletion of such contact you can write to us.
- 10.6. The Company may disclose Personal Data to Credit Information Companies, statutory authorities, regulators, law enforcement agencies, auditors, legal advisors, service providers, outsourcing partners, payment service providers, account aggregators, information utilities, KYC registration agencies, CKYCR, CERSAI, and other entities as required for providing services or complying with legal and regulatory obligations.
- 10.7. All third parties engaged by the Company and having access to customer information shall be bound by appropriate confidentiality, security, and data protection obligations.

11. Data requests from the Law Enforcement Agency

- 11.1. We do not sell, trade, or otherwise transfer your Personal Information except by this Policy. We do not share any information that directly identifies you with any third party, except in the following limited cases:
- 11.1.1. As required to comply with applicable law or regulation, or to comply with law enforcement;

- 11.1.2. To respond to claims and/or legal processes;
- 11.1.3. To protect our rights or our property, or to enforce our Terms of Service;
- 11.1.4. To help ensure the safety of the public or an individual;
- 11.1.5. To prevent behaviour that is (or that we think may be) illegal or unethical;
- 11.1.6. With your consent, or at your request or direction; or
- 11.1.7. As otherwise outlined in this Policy.

12. Security & Data Deletion Requests

12.1. Your Personal Information is extremely important to us. Your information resides on a secure server that only selected personnel have access to. Promotional and referral codes are random alphanumeric sequences that are encrypted. In addition to our precautions, it is important that you do not share your password, if any, with anyone. Although we try our best to protect your information, we cannot eliminate security risks associated with Personal Information.

12.2. The right to delete Personal Data. You have the right to request the deletion of Your Personal Data, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your personal information from our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:

- 12.2.1. Complete the transaction for which We collected the personal information, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- 12.2.2. Debug products to identify and repair errors that impair existing intended functionality.

- 12.2.3. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

- 12.2.4. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement if You previously provided informed consent.

- 12.2.5. Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us.

12.2.6. Comply with a legal obligation.

12.2.7. Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

13. Your Rights under the DPDP Act along with DPDP Rules

13.1. You may exercise Your rights of access, rectification, cancellation, and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, we will try our best to respond to You as soon as possible.

13.2. Please Note, we may process Personal Data under the following conditions:

13.2.1. If you have given your consent;

13.2.2. Performance of a contract;

13.2.3. Legal obligations;

13.2.4. To protect your vital interests;

13.2.5. In Public and Legitimate Interests.

13.3. Your Rights under the DPDP: Under the Digital Personal Data Protection Act, 2023, Data Principals may have the following rights subject to applicable law:

13.3.1. Right to access information relating to Personal Data being processed.

13.3.2. Right to correction, completion, updating and erasure of Personal Data.

13.3.3. Right to grievance redressal.

13.3.4. Right to nominate another individual to exercise rights on your behalf in the event of your death or incapacity, in accordance with Section 14 of the DPDP Act, 2023.

13.3.5. Right to withdraw consent previously provided.

To withdraw consent, users may write to us at admin@lrsdindia.com or use the opt-out link provided in our communications. Withdrawal shall be processed promptly and shall not affect any processing undertaken prior to such withdrawal.

13.4. In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

14. Changes to this Privacy Policy

14.1. We may update Our Privacy Policy from time to time and will update the changes by posting the new Privacy Policy on this page and update the “Last updated” date at the top of this Privacy Policy.

14.2. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

15. Contact Us

15.1. For any inquiries, please contact us at:

LRSD Securities Private Limited

Corporate Office: Unit No. Silver 27/01 and 27/02 Wave One, Block L, Sector 18,

Noida, Gautam Buddha Nagar, Uttar Pradesh, India, 201301

Email: admin@lrsdindia.com

Contact No.: +91 98102 78244
