

Privacy Policy

Last Updated: 27th September 2023

Our Privacy Policy provides an explanation of how we collect, use, and process your personal data when you use our website <https://www.wsfx.in/> (hereafter, "Website"), web application (hereafter, "web portal"), and mobile app (hereafter, "App").

It is important that you read this Policy carefully, as it becomes legally binding the moment you use our Services. Our company is committed to protecting your privacy and handling the personal information of those with whom we interact, whether they are customers, suppliers, or Agent responsibly and according to the laws of the countries in which we operate. You are subject to this "Privacy Policy" and our Terms and Conditions, as amended from time to time.

Scope

This Policy applies to protection of personal data collected, processed, used, stored, transferred and disposed by WSFX and covering all records created, received or maintained in hard copy or in an electronic form.

This policy is applicable to and is mandatory for all WSFX's employees and third-party vendors who bear responsibility for processing personal data and are obliged to ensure that personal data protection requirements defined in this policy are adhered.

1) Responsible Authority

The responsible authority for the collection, processing and use of personal data is:

WSFx Global Pay Limited ("WSFx Global Pay", "us", "we", "our") Authorized Dealer Category II Foreign Exchange House licensed by the Reserve Bank of India (RBI), WSFx Global Pay is headquartered in Mumbai and has a strategic branch network of 19 branches across key cities in India. WSFx Global Pay is listed with the Bombay Stock Exchange (BSE). As testament to its commitment to security and compliance, WSFx Global Pay holds an ISO27001 certification.

2) Information Collection and Use

The following details about you will be collected and processed by us:

- a) In the course of signing up for our service, you may give us information about yourself, such as your name and email address. In addition, we collect information you provide as you continue to use our Services, participating in discussion boards or other social media functions on our Website, Web portal or App, entering competitions, promotions or surveys, or reporting problems with our Services. Information that you provide may include your name, address, email address, phone number, financial information (including credit card or debit card details), payment reason, geographical location, social security number, and a photograph. All such information is stored or used for processing orders and under no circumstance are any of these details made available in the public domain. We may use this information to send you further information regarding our services.

- b) We may need more commercial or identification information from you in some situations, such as when you send or receive high value or high volume transactions.
- c) Any individual (other than yourself) you provide personal data of during your use of our Services, you promise to obtain that individual's consent to disclose his/her information to us as well as consent to our collection, use, and disclosure of such information for the purposes set out in this Privacy Policy.
- d) We may automatically collect the following information about your use of our Services:
 - Transaction details you carry out when using our Services, including the geographical location from which the transaction originated;
 - Your Internet protocol (IP) address, the browser type and version, your time zone setting, the browser plug-in types and versions, and the operating system and platform used to connect your computer to the Internet;
 - Your visit to our Website, Webportal or App, including the Uniform Resource Locators (URL) click stream to, through, and from our Website or App (including the date and time); the products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicking, and mouse-overs), and any phone number used to contact customer support.
- e) We may collect, store or accumulate certain non-personally identifiable information concerning your use of this Site, such as information regarding which of our pages are most often visited. We may share with or transfer to third parties such non-personally identifiable information for the purpose of maintaining the Site, responding to direct inquiries or measuring traffic and traffic trends on this Site. We do not otherwise provide or sell any of this information to third parties.

2.1 Information from social media networks

When you log in to our Services with your social media account (e.g., Facebook or Google etc.), we will receive relevant information about your account that is necessary to enable our Services and authenticate you. We will have access to certain information that you have provided to the social networking site, including your name, profile picture, and email address. As well as any other information that you provide us directly when registering or using our Services, we use this information to create your account and to communicate with you about the information, products, and services you request from us. We may also ask for access to your social media contacts so you can send referrals to your friends and family. All of this information will be used, disclosed, and stored in accordance with this privacy policy.

2.2 Cookies:

As part of providing you with the greatest experience, we use small files (known as cookies) to distinguish you from other users, to see how you use our site and products. We can also use them to improve our services.

2.3 Links

Links to or from this Site may be found on other websites. You should be aware that we are not responsible for the privacy practices of other websites. The Privacy Policy applies only to information collected by this site. We recommend that you read the privacy policies of other websites that you link to from our site or other websites that you visit.

2.4 Data Retention:

- WSFx Global Pay, as a regulated financial institution, is required by law to retain some of your personal and transactional data after the closure of your account with us. Data is only accessed or processed by us if absolutely necessary, and we'll only access or process it based on a need-to-know basis.
- If a relevant law or jurisdiction in which we operate no longer requires the data, we delete it.

2.5 Your rights

Depending on the applicable law, you may have the right to access information we hold about you. In accordance with the relevant data protection legislation, you may exercise your right of access. We are happy to answer any questions you have about our use of your personal information. In certain circumstances, you may be entitled to request that we:

- We will provide you with further details about the use of your information;
- Provide you with a copy of the information you have provided to us;
- rectify any inaccurate, incomplete, or out-of-date personal information we possess;
- Delete any personal information that is no longer necessary, or that does not comply with a legal obligation to which WSFx Global Pay is subject. As a result of legal obligations, it may not be possible to delete your data immediately upon request. We will be able to comply with your request once the required time has passed;
- In cases where processing is based on consent, you may withdraw your consent to stop that particular processing;
- If you no longer wish to receive direct marketing messages, simply contact us or adjust your notification preferences in the settings section of your account;
- When we make a wholly automated decision that may create a legal obligation or similar significant impacts, you may ask us for information regarding the decision-making methodology and for verification that the automated decision was made correctly. Depending on applicable law, we may reject the request, including when

providing the information would result in the disclosure of a tradeseecret or interfere with the prevention or detection of fraud or other crimes. As a general rule, in this scenario, we will verify that the algorithm and source data are functioning as anticipated without error or bias, or, if required by law, we will adjust the processing.

- You may object to processing based on legitimate interests unless our reasons for doing so outweigh any prejudice to your data protection rights
- If a complaint is under investigation, your information may be restricted

3) **Disclosure of Information:**

Where required, we will (subject to our professional obligations and any terms of business which we may enter into with you) disclose your personal data to:

- any person or entity to whom we are required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body;
- our professional advisers or consultants, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us; and
- Service-providers who provide information technology and system administration services to us.

4) **Notification of Changes**

This Privacy Policy may be revised from time to time. We will post any changes to our Privacy Policy here if we decide to do so. In view of the possibility that we may change this Privacy Policy at any time without informing you, we suggest that you review it periodically. Whenever any information is collected, our rights to use it will be determined by the privacy policy that is in effect at the time.

5) **Contact**

Please send any questions, comments or requests regarding this privacy policy to our privacy team at info@wsfx.in