INFORMATION SECURITY & PRIVACY POLICY FRAMEWORK	
Customer & Website Privacy Policy	SAFEGOLD

POLICY TITLE	**Customer & Website Privacy Policy**
DOC. NO., ISSUE NO. & DATE	**DGIPL-ISMS-PL-31 Ver 2.1 & 02/11/2026**
TOTAL NO. OF PAGES	**6 (Six)**
REVISION HISTORY	

Ver.	Date	Description of Change
1.0	10/10/2024	Initial Release
2.0	25/02/2026	Annual review of policy
2.1	02/11/2026	Added promotional communications as a processing purpose (5.1, 5.2); updated data sharing (7.1) and customer rights (10.1).

POLICY PURPOSE	**This Customer & Website Privacy Policy outlines how SafeGold collects, uses, stores, discloses, erases and protects the personal data of customers, website visitors, and mobile application users. The policy ensures compliance with the Digital Personal Data Protection Act, 2023 (DPDP Act) and the Information Technology Act, 2000 including the rules framed thereunder, establishing SafeGold's commitment to responsible personal data handling practices.**
ACCOUNTABILITY & RESPONSIBILITY	**Human Resources, Information Security (Infosec) Team, IT Department, Compliance / Legal Team & Reporting Managers/Function Head**
POLICY APPLICABLE TO	**This policy applies to all customers, website visitors, mobile app users, and individuals interacting with SafeGold through digital platforms.**

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POLICY MADE EFFECTIVE FROM	**November 03, 2026**	
POLICY MADE BY	**Akshat Singh (InfoSec Compliance Manager)**	
POLICY REVIEWED BY	**Yashu Mishra Lead Legal**	
POLICY APPROVED BY	**Rhea Chaterji COO**	
Date on	**November 02, 2026**	

1. OBJECTIVE	This Privacy Policy explains how DGIPL (SafeGold) collects, uses, discloses, erases and protects the personal data of customers, website visitors, and mobile app users in accordance with the Information Technology Act, 2000 and the Digital Personal Data Protection Act, 2023 and its Rules.
2. SCOPE	This policy applies to: • Customers using SafeGold products or services on the website or mobile application; • Users visiting SafeGold websites or mobile applications; • Individuals interacting with SafeGold digitally (email, forms, support requests)
3. INFORMATION WE COLLECT	**3.1. We may collect the following categories of information:** • Personal details (name, mobile number, email address) • KYC data in line with Industry best practices or as recommended by authorities formally or informally, from time to time • Transaction and account-related details • Device and browser details (IP address, OS version, device identifiers) • Cookies and usage analytics • Customer support interactions and support history
4. HOW PERSONAL DATA IS COLLECTED	**4.1. Data is collected through:** • Website/app forms and activity logs • Account creation and processes • KYC procedures • Cookies and analytics tools • Customer support channels • Transactional interactions

5. PURPOSE OF COLLECTING AND PROCESSING CUSTOMER DATA	**5.1. SafeGold processes customer data for the following purposes:** • Providing and improving SafeGold's products and services • Verifying identity and completing KYC checks • Processing transactions and customer requests • Ensuring cybersecurity and fraud prevention • Improving our website/app and user experience • Compliance with legal and regulatory obligations • Sending promotional alerts, RCS messages and WhatsApp notifications about SafeGold's products and services, subject to the customer's right to opt out as set out in clause 5.2 **5.2. Promotional Communication:** Consent for promotional communications is not a condition for using SafeGold's products or services. Customers may withdraw this consent at any time by following the unsubscribe instructions in the message or by writing to privacy@safegold.in. Transactional and service-related messages, such as OTPs, transaction alerts and account notifications, will continue to be sent after a customer opts out, as they are necessary to provide the service.
6. COOKIES AND TRACKING TECHNOLOGIES	**6.1. SafeGold uses first-party and third-party cookies for:** • Website performance and functionality • Security and fraud detection • Analytics and insights • Personalizing user experience **6.2.** Users may control or disable cookies through browser settings, but certain functionalities may be affected.
7. DATA SHARING	**7.1. SafeGold may share customer data with:** • Affiliated entities; • Third-party service providers such as KYC vendors, hosting partners, fraud monitoring tools, logistics providers and payment processors; • Regulatory authorities, law enforcement agencies, or courts when required by law. • Communication service providers such as SMS, RCS and WhatsApp messaging partners **7.2.** All third parties operate under strict confidentiality covered under the respective agreements.

8. CROSS-BORDER TRANSFERS	**8.1.** SafeGold does not transfer or store customer data outside India.
9. DATA RETENTION AND ERASURE	**9.1. Customer data is retained only as long as necessary to:** • Fulfill the purpose of collection • Comply with statutory requirements (e.g., financial records) • Resolve disputes and enforce agreements **9.2.** Data may be anonymized for analytical purposes. **9.3.** Once the Personal Information has reached its retention period, it shall be deleted in compliance with applicable laws.
10. CUSTOMER RIGHTS	**10.1. Customers may exercise the following rights under the DPDP Act:** • Access personal data • Request correction • Request deletion (where legally permissible) • Withdraw consent, including for promotional communications, at any time • Raise grievances **10.2.** Requests can be sent to the designated Compliance Team.
11. SECURITY MEASURES	**11.1. SafeGold employs robust security controls including:** • Encryption and pseudonymization • Secure coding practices • Network and application security • Periodic vulnerability assessments • Access control mechanisms
12. BREACH NOTIFICATION	**12.1.** SafeGold will notify affected individuals and relevant authorities in accordance with the applicable law in the event of a data breach.
13. UPDATES TO THIS POLICY	**13.1.** SafeGold may update this policy from time to time. Updated versions will be published on the official website/app. Users are encouraged to review this Policy periodically to remain informed of any updates.

14. CONTACT & GRIEVANCE REDRESSAL	**14.1.** For any privacy-related queries or requests, customers may contact: Compliance Team Digital Gold India Private Limited Email: privacy@safegold.in
15. POLICY GOVERNANCE	**15.1. Effective Date:** This policy supersedes all prior versions and shall be considered effective immediately. **15.2. Right to Modify:** The management reserves the right to amend, modify, or withdraw this policy at its discretion, with appropriate notice provided to all customers.
16. DATA MINIMIZATION	**16.1.** DGIPL collects and processes Personal Data only to the extent necessary for the specified purposes for which such data is obtained. Personal Data is limited to what is relevant and proportionate for such Purposes and is not collected in excess.
17. NOTE	**17.1.** Prior to the implementation of this Policy and the enforcement of the Information Technology Act, 2000 and DPDP Act, 2023, DGIPL collected and processed personal data of customers as necessary for providing its products and services and for complying with applicable legal and regulatory requirements. **17.2.** In line with the principles of transparency and consent under the Information Technology Act, 2000 and DPDP Act, DGIPL shall now implement an explicit consent framework. Accordingly, DGIPL will issue a notification to all existing customers informing them about this Privacy Policy and seeking their consent for the continued collection, use, storage, and processing of their personal data in accordance with this Policy. Promotional communications are governed by clause 5.2 **17.3.** Customers shall have the option to provide, review, modify, or withdraw their consent, subject to applicable laws and statutory obligations.