



## Privacy Policy

Applicable to Customers using Dhani Pay Prepaid Account and Dhani Pay Card issued by TranServ Limited (“TranServ”)

*Last Updated: 09th May 2026*

**Please read this privacy policy carefully before accessing / using the mobile app/site and**

TranServ Limited (“TranServ”, “we”, “our”, or “us”) is committed to protecting the privacy, confidentiality, and security of personal data entrusted to us by users of our products, services, mobile application namely “Dhani App” and website [www.dhanipay.in](http://www.dhanipay.in) (collectively referred to as the “Platform”).

This privacy policy (“**Policy**”) discloses the practices and policies adopted by TranServ how we collect, use, store, share and process personal data in compliance with applicable Indian laws, including:

- The Digital Personal Data Protection Act, 2023 (“DPDP Act”);
- The Information Technology Act, 2000 and rules made thereunder;
- Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- Reserve Bank of India (“RBI”) regulations applicable to Prepaid Payment Instruments (“PPI”); and
- Other applicable laws, rules, regulations, circulars, and guidelines.

This Policy applies to all users ( “User”, “You” or “Your”) accessing or using Dhani App, website, prepaid instruments, cards, financial products or any related services ( “Services” offered by TranServ through mobile applications, websites or partner platforms.

This Privacy Policy applies regardless of whether the Platform is accessed by use of a computer, mobile phone, tablet or any other media or computer resource. The Terms and Conditions of Use of the Platform are incorporated in this Policy by reference.

## **Nature of the Policy**

This Privacy Policy constitutes an electronic record under the Information Technology Act, 2000 and does not require any physical or digital signature.

By accessing or using the Platform, you acknowledge that you have read, understood, and agreed to the terms of this Privacy Policy and consent to the collection and processing of your personal data in accordance with applicable law.

TranServ reserves the right to change or modify or review or update the provisions of this Policy without prior notice. Therefore, Users are requested to periodically visit the Platform and review the Policy. Any such changes or updates etc. will be effective immediately upon posting the same on the Platform.

### **1. Definitions**

“Applicable Law” means all applicable statutes, acts of Indian legislature, ordinances, rules, bye-laws, regulations, notifications, circulars, guidelines, policies, directions, directives and orders of any government, statutory authority, regulatory authority, tribunal, board or court in India;

“General Information” shall have the same meaning ascribed to it in clause 2.5 of the Policy.

“Personal Information” shall mean information disclosed by or obtained from any User and includes without limitation name, age, occupation, marital status, email, residential address, telephone number, SMS messages, payment processing details, and any other personal details capable of identifying such a person.

“Sensitive Personal Information” shall, excluding any information that is freely available or accessible in the public domain or is furnished under Applicable Laws, mean the following information:

- a. Password;
- b. SMS messages
- c. sexual orientation; and
- d. financial information such as bank account or credit/debit card details or other payment instruction details.

“User” means any person who visits or uses the Platform or has an account at the Platform.

## 2. Collection of Information

2.1. A User may be required to reveal Personal Information or Sensitive Personal Information for the purposes of (a) browsing through the Platform; (b) opening an account/registering at the Platform; (c) applying to purchase products/avail services at the Platform; or (d) purchasing products/ availing services at the Platform.

2.2. Prior to furnishing Personal Information/ Sensitive Personal Information to TranServ for any one or more of the purposes described above, a User must grant consent to TranServ for using the Personal Information. The Personal Information/Sensitive Personal Information will be used only for the purposes set out in Clause 3 of the Policy. If the User does not wish to provide such Personal Information/ Sensitive Personal Information, the User must not proceed with using the Platform.

2.3. TranServ may collect Personal Information and Sensitive Personal Information for a lawful purpose connected with providing financial products and services, including compliance with RBI regulations and KYC obligations.

2.4. TranServ will not be responsible for the validity, accuracy, correctness or completeness of the Personal Information/ Sensitive Personal Information provided by the User, or any consequences arising in relation to the invalidity, inaccuracy, incorrectness or incompleteness of the Personal Information/ Sensitive Personal Information. The User must update the Personal Information/ Sensitive Personal Information to ensure that such information is valid, accurate, correct and complete.

2.5. While browsing through the Platform, the Platform server may automatically record some general information about User's visit, such as the date and time of visiting the Platform, the IP address being used, GPS/Cell tower location (where permitted), browser language, IP address, operating system etc. (**“General Information”**). Such General Information collected is not Personal Information/ Sensitive Personal Information for the purpose of this Policy.

2.6. TranServ reserves the right to use General Information collected by it for any purpose whatsoever including statistical analysis, tracking overall traffic patterns and marketing and promotional purposes. Consequently, TranServ may share such General Information or any analysis with any third party, at its discretion.

2.7. Permissions and Optional Data : TranServ may request your consent for access to specific device permissions only where required for lawful purposes or core app functionality, such as:

- Camera access for KYC verification
- Location access for fraud prevention and regulatory compliance
- SMS access solely for OTP auto-read functionality (where enabled)
- Notification access for transaction alerts and security updates

We do not access personal SMS content, contacts, call logs, photos, or installed applications unless specifically required for a lawful purpose and separately consented to by you.

### **3. Use of Personal Information and Sensitive Personal Information**

Personal Information/ Sensitive Personal Information disclosed to TranServ by a User will be used by TranServ for one or more of the following purposes:

- Customer onboarding and KYC verification
- Identity authentication
- Issuance and management of prepaid payment instruments/cards
- Processing transactions and payments
- Fraud prevention, risk monitoring, and security
- Customer support and grievance handling
- Compliance with RBI guidelines and legal obligations
- Detection and prevention of unlawful activities
- Sending service-related communications and alerts
- Improving Services, analytics, and operational efficiency
- Any other purpose permitted under applicable law.

We process only such personal data as is necessary for the purposes stated above.

### **4. Retention Period**

We retain personal data only for as long as necessary for:

- providing Services,
- fulfilling contractual obligations,
- complying with legal and regulatory requirements,
- resolving disputes,
- enforcing agreements, or
- preventing fraud and abuse.

Retention periods shall be determined in accordance with applicable RBI regulations, anti-money laundering laws, and other legal requirements. Upon expiry of the applicable retention period, personal data shall be deleted or anonymized in accordance with applicable law.

## **5. Cookies**

We may use cookies and similar technologies to:

- maintain user sessions,
- improve functionality,
- analyze usage trends,
- prevent fraud, and
- enhance security.
- Enhance user experience;
- Remember user preferences;
- Improve security and authentication; and
- Support analytics and advertising activities.

Users may manage cookie settings through browser or device controls. Certain Platform functionalities may not operate effectively if cookies are disabled.

## **6. Information Sharing and Disclosure of Personal Information and Sensitive Personal Information**

6.1. Only Persons authorized by TranServ shall have access to Personal Information/ Sensitive Personal Information disclosed to TranServ. User grants explicit consent to TranServ for sharing Personal Information/ Sensitive Personal Information with persons who are associated with TranServ.

You are being made aware that you can at any time withdraw your consent to process the personal data shared by you with us and we shall within reasonable time, after having received such withdrawal request from you, cease to process your personal data, unless otherwise required as per the applicable law in force.

You are also being made aware that you may exercise your rights under the provisions of the Digital Personal Data Protection Act, 2023 (“Data Protection Data”) and get in touch with the designated Data Protection Officer should you have any queries/concerns/grievances regarding the personal data processing at our end and/or your rights under the prevailing law.

That after your having read and understood the above, you hereby specifically consent for processing of your personal data by us in accordance with this Policy. Kindly note that Transerv will be free to use, collect and disclose information / personal data that is freely available in the public domain without your consent.

No liability pertaining to the authenticity/ genuineness/misrepresentation etc. of your personal data provided to us or with regard to any fraud or negligence thereof shall lie

on Transerv nor we be in any way responsible to verify any information/ personal data obtained from you. You hereby specifically agree and provide your consent thereby enabling Transerv to collect, store, transfer, process and share your personal data related to you with third parties including but not limited to Banks, financial institutions, credit information companies, payment gateways/ collecting banks etc. solely for the purpose of processing your transaction requests for the Service(s).

6.2. Notwithstanding anything contained in this Policy, TranServ may share your Personal Information/ Sensitive Personal Information that may be required to be disclosed to Regulatory Authorities, law enforcement agencies or courts where required under Applicable Law or for prevention or investigation of fraud, cyber incidents, or illegal activities and/or to protect rights, security, or property of TranServ, users, or the public,.

### **6.3 Information Sharing with Partners of Transerv :**

You may use services/suite of financial products offered from a curated set of bank(s), financial institution(s), insurer(s), by lending partner(s), loan aggregator(s) etc. {Hereinafter individually and collectively referred to as the “Partner(s) of Transerv”}. You are made aware that the information that is stored and collected by us would be used for a lawful purpose in accordance with this Privacy Policy including but not limited to fulfilling internal operations, fulfilling requests, providing assistance for completion of online personal loan submission, improving, developing or otherwise facilitating provision of financial products by the Partner(s) of Transerv

### **8. Disclosure to Third Party**

8.1. In case the information is being collected and retained by a third party, on behalf of TranServ, TranServ shall obtain prior permission from the User before transfer of information to any third party, unless such disclosure is necessary for compliance of a legal obligation. Such obligation is also not applicable in case such information is being transferred to a government agency, when a request for such transfer has been made by such government agency to TranServ.

8.2. TranServ may transfer Personal Information/ Sensitive Personal Information to any company or person located in India only if it is necessary for the performance of lawful contract between TranServ and such person/company, provided the same level of data protection will be adhered to by the other person/ company. TranServ cannot guarantee that such parties will keep the Personal Information/ Sensitive Personal Information confidential and TranServ will not be liable in any manner for any loss of confidentiality attributable to such third parties.

8.3. TranServ does not rent, sell or share the information being collected from Users to

third parties for consideration.

## **9. Security**

9.1. TranServ has taken all reasonable measures and precautions to keep the Personal Information and Sensitive Personal Information safe and secure and to prevent any unauthorized access to or misuse of the same.

9.2. TranServ may employ procedural and technological security measures, consistent with the relevant industry practice. Such measures are reasonably designed to help protect the Personal Information/Sensitive Personal Information from loss, unauthorized access, disclosure, alteration or destruction. TranServ may also use encryption, secure socket layer, firewalls, internal restriction, password protection and other security measures to help prevent unauthorized access to the Personal Information/Sensitive Personal Information.

9.3. TranServ shall not be liable to any User for any loss, damage (whether direct, indirect, consequential or incidental) or harm caused to the User due to the unauthorized access or misuse of the Personal Information/ Sensitive Personal Information by any third party (beyond the control of TranServ).

## **10. Linking to other mobile app/sites**

TranServ is not responsible for the privacy practices or the content of any other mobile app/websites for which links may be provided on the Platform or which provides links to the Platform. By clicking on a link, logo or other such items, or using certain services available on the Platform , the User may no longer be on the Platform and in such circumstances the privacy policy (if any) of such other mobile app/website shall apply. Users are encouraged to read the privacy policy/ statement of such other mobile apps/websites.

## **11. Aggregate Information**

TranServ may track the total number of visitors, IP addresses, geographical location, age group and gender of Users, etc. and may analyze this data for trends and statistics in the aggregate. However, such information will be maintained, used, and disclosed in aggregate form only and will not contain any Personal Information/Personal Sensitive Information. TranServ may use such information to analyze various trends and gather broad demographic information for aggregate use. TranServ may share this aggregate information with third parties to assist them in targeting advertisements to appropriate audiences.

## **12. Contact Us**

If you have any questions, comments, concerns or grievances about this Policy or your personal data or if you wish to report a violation of the Terms of Use or this Policy and have any question or need assistance, please contact

Grievance Officer/Data Protection Officer

Transerv Limited

Email: [support.dhanipay@indiabulls.com](mailto:support.dhanipay@indiabulls.com).

## **13. Updates**

TranServ reserves the right to update / change / alter or update the Terms of Use or this Privacy Policy from time to time to incorporate necessary changes in technology, applicable laws or any other variant. Any update made will be effective immediately. Use of the services provided by TranServ after such update will be deemed acceptance of such changes. Users are advised to review this Policy periodically on the Platform to ensure that you are aware of the latest version.

## **14. Governing Law and Jurisdiction**

This policy will be governed by and construed in accordance with the laws of India and subject to the exclusive jurisdiction of Courts at Delhi.