

PRIVACY POLICY

Meta Materials Circular Markets Private Limited (“**MMCM**”) values your privacy. MMCM operates various digital platforms and services across multiple verticals, one of the verticals being DigiELV.

DigiELV is the Ministry of Road Transport and Highways, Government of India (“**MoRTH**”) authorized online platform for trading Certificate of Deposit (“**CD**”) facilitating price determination for various CD categories. DigiELV enables participants to negotiate and trade certificates across all categories of vehicles and is seamlessly integrated with the VAHAN platform. DigiELV also generates and issues transfer certificates instantly to the buyers.

This Privacy Policy explains how DigiELV (hereinafter referred to as “We”, “Us”, “Our”) handles personal information that we collect online, through websites and applications (apps) and through our offline communications with you.

This Privacy Policy does not apply to information collected from residents of countries other than India, or to third-party websites to which DigiELV may link. Please read this Privacy Policy before using the DigiELV Services or submitting personal information to us. While personal data or information is the cornerstone of our ability to provide superior service, our most important asset is our customers' trust. Keeping customer information secure and using it as our customers may so allow, is a top priority for us at DigiELV. This Privacy Policy covers inter alia, the type of personal information and purpose for which DigiELV collects and processes your personal information on DigiELV websites, platforms, servers, online marketplace and applications (together “DigiELV Services”).

Your use of our services is subject to this Privacy Policy and the Terms of Use.

“**Personal information**” is information that directly or indirectly, individually or in combination with any other information is capable of identifying you as an individual or any other information that relates to an identifiable individual. A few examples of personal information include your name, postal address, and telephone/mobile number among many others. Some categories of personal information, including but not limited to your financial information, passwords, sexual orientation, biometric information, and other health information, qualify as sensitive personal data or information as per the laws in India and have been afforded protection under applicable statutes. We are in compliance with all such applicable legislations and have implemented reasonable security practices and procedures within our organization.

By using our services you expressly agree to our use of your personal information in accordance with this Privacy Policy, as may be amended by us, from time to time. You also agree and consent to us collecting, storing, processing, transferring, and sharing your personal information with third parties or service providers for the purposes set out in this Privacy Policy

Information Collection and Use

DigiELV collects your personal information in order to provide and continually improve its services. We receive and store any information you provide as a Participant to DigiELV and would collect and store the following information:

1. Name
2. Address
3. Date of birth
4. Age
5. Contact Details
6. Pan Card Details
7. Identity Details
8. User IDs and Password to access DigiELV Websites/ Application and related services
9. Financial information such as Bank Account or credit card or debit card or other payment instrument details
10. Trade related information as conducted on different DigiELV Platforms
11. Any other information that you may submit to us towards becoming a Participant with DigiELV for trading on DigiELV Platform
12. Audiovisual data including video recordings, photographs, and audio captured during the V-KYC process
13. Supplemental documentation for enhanced due diligence, identity verification, or security assessments.

We use your personal information to enable it to enroll you as a Participant so as to enable its users to operate, trade and settle transactions on DigiELV platform. These purposes include:

1. **Purchase and sale of commodities-** We use your personal information to enable price discovery between buyers and sellers as well as for settlement of transactions on its Platform.
2. **Improve DigiELV Services** – We use your personal information relating to your activity on our Website or Applications to assess your trading pattern, provide enhanced functionality, analyze obligation performance pattern, fix errors, and improve the usability and effectiveness of the DigiELV Services.
3. **Recommendations and personalization** – We use your personal information to recommend

products, and services that might be of interest to you, identify your preferences, and personalize your experience.

4. **Comply with legal obligations** - In certain cases, we collect and use your personal information to comply with legislations, governmental or regulatory orders. Most of your sensitive personal data collected by us, is collected for this purpose.
5. **Communicate with you** - We use your personal information to communicate with you in relation to DigiELV Services via different channels (e.g. by phone, sms, whats-app, e-mail, chat etc). This may include communication needed to share transactional information with DigiELV Privacy Policy regards to your sale or purchase on the platform, or your use of our services, or security alerts regarding your V-KYC status or account login. We may also use your contact details to inform you about our promotional offers and events.
6. **Assess Credit Risk** – We may use your personal information to assess your credit scores and patterns which may be shared with third parties including Banks/Financial Institutions and/or financial intermediaries, from time to time.
7. **Trade Finance and Credit Limits** – We may use your personal information to share with Banks and Financial Institutions wherein you have requested for obtaining Trade Finance/ Credit Facilities towards funding of the trades conducted on DigiELV Platform

Right to Request Additional Information

MMCM reserves the right to request additional information or documentation at any stage of your engagement as a Participant. Such requests may be necessitated by changes in law, internal security audits, or to maintain the safety of the DigiELV ecosystem. Failure to provide such information may result in the suspension or termination of your access to DigiELV Services.

Video KYC and Identity Verification

To ensure the integrity of the DigiELV Platform and comply with regulatory standards, MMCM has implemented a Video KYC process. By participating in the V-KYC process, you explicitly consent to:

1. **Recording & Storage**- The capturing, recording, and storage of your video and audio feed for the purpose of identity verification.
2. **Liveness Detection**- The use of facial recognition and liveness detection technologies to ensure the participant is physically present and to prevent spoofing.
3. **Document Capture**- The capturing of images of your original identity documents (such as PAN, Aadhaar, etc.) during the video session.
4. **Verification via Third Parties**- Sharing this audiovisual data with authorized government databases or regulated third-party verification service providers solely for the purpose of validating the authenticity of the information provided.

Sensitive Personal Data

Your financial information, password and details regarding your official identifiers collected by us such as audiovisual recordings, and biometric signatures collected during the V-KYC process, qualify as sensitive personal data or information under applicable legislations. However, we are legally obligated to collect this data in order to be able to cater our services to you. We maintain all reasonable standards as required by applicable legislations to protect and preserve your sensitive personal data or information. Your personal information is stored at our data centers in Mumbai, India.

Automatic Information Collection

Information about the user's computer software may be automatically collected by the company. This can include but is not limited to the following: user IP address, browser type, domain names, access times, and referring website addresses. This information is used for the operation of the service, to maintain the service quality, and to provide general statistics regarding the use of the company's website. Please note that this information is collected anonymously and does not personally identify you. We may combine this data with other anonymous data to create aggregate statistics about our website usage.

Data Sharing and Consent

We will not share your personal information with third parties except for the intended purpose for which such information is provided by the User, in which case the User's consent is implied. You have the right to withdraw your consent at any time.

We share our customers' personal information with third parties only as described below:

1. **Transactions involving Third Parties** -We may share your personal information with Banks and Financial Institutions to enable Banks/Financial Institutions to contact you for offering Trade Finance/ Credit Facilities through funding of trades executed on DigiELV Platform.
2. **Trades involving Private and Government Agencies** – We shall share your personal information with Private and Government & Semi/Quasi Government Agencies wherein you have participated in auction initiated over DigiELV Platform by such entities.
3. **Third-Party Service Providers:** DIGIELV may employ other entities and individuals to perform certain functions for its Participants for which personal information may have to be shared by DIGIELV with such third-party service providers. Examples include transporters, assayers, warehouse service providers, SMS and e-mail service providers, data analytics, entities providing marketing assistance, payment processors etc. Such third-party service providers may have access to your personal information needed to perform their functions, but may not use it for other purposes. Further, such service providers have been apprised the need to maintain the personal information in accordance with applicable law.
4. **Business Transfers/Takeovers/Mergers:** We might sell its business or engage in a takeover

or a merger with another entity. In such transactions, personal information of the Participants generally form part of such business transfer/takeover/merger arrangements.

5. **Compliance with Statutory requirements:** We may release personal information for compliance with the statutory/regulatory requirements or as may be directed by law enforcement agencies from time to time without seeking consent of the User.

Cookie Policy

Cookies are small text files that are stored on your device when you visit a website. They help us recognize you when you return to our website and remember your preferences.

We may use cookies and similar tracking technologies to enhance your user experience and provide personalized features. By continuing to use our website, you consent to our use of cookies. You can manage your cookie preferences through your browser settings.

Governing Law and Jurisdiction

This website is governed by the laws of India. If you access our website from outside of India, you do so at your own risk and are responsible for complying with applicable local laws. Any legal disputes arising from your use of our website will be subject to the exclusive jurisdiction of the courts of India.

Personal Account

If you register and use an online account on our sites, you are solely responsible for maintaining the confidentiality of your account and password and for restricting access to your computer.

Your password is essential for protecting your account and personal information. You are solely responsible for keeping your password confidential and for any actions taken using your account. Sharing your password or personal information with others may lead to unauthorized access and legal consequences. If you suspect your password has been compromised, change it immediately to secure your account. We are not responsible for any consequences resulting from your failure to maintain password security.

Data Retention

We will retain your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by law. Once your account is deleted, we will retain your information in accordance with our record retention policies, which comply with legal requirements. We will delete your personal information when it is no longer needed or upon your request.

Data Security

We take the security of your data seriously. We utilize a variety of commercially reasonable security measures to protect your personal information from unauthorized access, disclosure, alteration, or

destruction. These measures include encryption, passwords, and physical security controls.

DigiELV designs its systems with your security and privacy in mind.

- DigiELV works to protect the security of your personal information during transmission by using encryption protocols and software.
- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, processing, and disclosure of User information. DigiELV's security procedures mean that we may occasionally request proof of identity/change of passwords/ user authentication before we disclose personal information to you.
- Additionally, DigiELV has a comprehensive documented information security programme and information security policy (ISMS policy) that contain managerial, technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business.
- DigiELV has obtained ISO 9001:2015 as well as ISO 27001:2013 certifications covering information security management system.
- All audiovisual data and biometric identifiers collected during the V-KYC process are subject to enhanced security protocols. This data is encrypted both in transit using secure socket layers and at rest within our secure data centers to prevent unauthorized access or interception.
- Access to V-KYC recordings is strictly restricted to authorized personnel and is subject to automated audit trails to ensure it is used only for the purpose of identity verification and compliance.

However, no method of transmission over the internet or electronic storage is completely secure. While we strive to protect your information, we cannot guarantee its absolute security. Like all internet platforms, there is a risk that unauthorized third parties may unlawfully intercept or access transmissions. We are also not responsible for the security practices of third-party websites you may access through our platform.

Your Rights

Depending on where you live and applicable laws, you may have some or all of the rights listed below in relation to your personal information. However, these rights are not absolute, may apply only in certain circumstances and, in certain cases, we may decline your request as permitted by law.

- **Right to Access / Know:** You may have a right to request access to personal information that we hold about you, including details relating to the ways in which we use and share your information.
- **Right to Delete:** You may have a right to request that we delete personal information we maintain about you.
- **Right to Correct:** You may have a right to request that we correct inaccurate personal

information we maintain about you.

- **Right of Portability:** You may have a right to receive a copy of the personal information we hold about you and to request that we transfer it to a third party, in certain circumstances and with certain exceptions.
- **Restriction of Processing:** You may have the right to ask us to stop or restrict our processing of personal information.
- **Withdrawal of Consent:** Where we rely on consent to process your personal information, including for Video KYC (V-KYC) and biometric verification, you may have the right to withdraw this consent at any time. However, please note that if you withdraw consent for V-KYC, we may be unable to verify your identity or provide you with continued access to DigiELV Services, as this process is mandatory for the security and integrity of the platform.
- **Appeal:** You may have a right to appeal our decision if we decline to process your request. You can do so by replying directly to our denial.
- **Managing Communication Preferences:** We may send you promotional emails, and you may opt out of receiving these at any time by using the unsubscribe option displayed in our emails to you. If you opt out, we may still send you non-promotional emails, such as those about your account or orders that you have made.

You may exercise any of these rights by contacting us using the contact details provided below

We will not discriminate against you for exercising any of these rights. We may need to collect information from you to verify your identity, such as your email address or account information, before providing a substantive response to the request. In accordance with applicable laws, you may designate an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us. We will respond to your request in a timely manner as required under applicable law.

Third-Party Links

Our website may also contain links to third-party websites that are not operated by DigiELV. We provide these links for your convenience, but we do not endorse or control these websites.

Please be aware that the privacy policies of these third-party websites may differ from ours. We encourage you to review the privacy policies of any linked websites before providing your personal information. We are not responsible for the content or practices of these third-party websites.

Payment Gateway

We prioritize the security of your payment information. To ensure your data remains protected, we utilize a secure payment gateway for all transactions. Your payment details are not stored on our servers and are transmitted directly to our trusted payment provider. For comprehensive information about their

data handling practices, please refer to the privacy policy of our payment gateway partner.

Chargeback Policy

If you believe there has been an error in processing your payment or if you dispute a charge, please contact our customer support team immediately at +91-7710011388 or digielv@mmcm.in. We will promptly investigate the matter and provide a resolution.

Unauthorized Chargebacks

If a chargeback is initiated against your account without a valid reason, we may charge a fee to cover the costs associated with the dispute. Additionally, we may restrict your future access to our services or products.

Preventing Chargebacks

To avoid chargebacks, please ensure that you have sufficient funds in your account before making a purchase and carefully review your transaction details. If you have any questions about your payment, please contact us before initiating a chargeback.

Severability

Whenever possible, each section of this Privacy Policy shall be interpreted in a manner so as to be valid under Applicable Laws. However, in the event any provision is held to be prohibited or invalid, such provision shall be ineffective only to the extent of such prohibition or invalidity, without invalidating the remainder of such provision or other remaining provisions of this Privacy Policy.

Children Information

DigiELV does not knowingly collect any personally identifiable information from children under the age of eighteen (18). Our website is not intended for minors.

Contacting Us

If you have any questions about our privacy practices, wish to access or correct your personal information, or want to request the deletion of your data, please contact our grievance officer with a thorough description, and we shall endeavor to resolve it. We are committed to maintaining the accuracy of your information and will make reasonable efforts to respond to your requests in a timely manner.

Please note that our privacy policy may be updated from time to time. We encourage you to review this policy periodically for any changes. Unless stated otherwise, DigiELV's current Privacy Policy applies to all information that we have about you and your account.

Grievance Officer

Please find below the details of the grievance officer:

Name: Mr. Sriram Iyengar

Designation: Grievance officer **Email:**

info@mmcm.in