

Doc. Info. No.:	FYNXT-POLICY-014	Ver. No. Date:	V2.0 14.10.2022	Info. Classification:	Public
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Summary:

We have prepared a summary of our Privacy Policy to help you understand how we process your personal data. Further, we recommend that you also read the full version of the Privacy Policy to fully understand how we handle your personal data and what options and rights you have concerning your personal data.

KEY POINTS	SUMMARY
Who is responsible for collecting and using your data?	FYNXT is accountable for collecting and using your personal data.
Data we use	We process your personal data that you directly provide to us or that we collect when you use our Product. We may also receive personal data about you from third parties.
What do we use it for?	We will use your personal data only when we have a lawful basis to do so, such as the performance of a contract when you use our Product, with your consent, for our legitimate interest, or to comply with our legal obligations.
How long we keep your data?	We will not store your personal data for longer than we need it. In most cases, we will keep your personal data only if it is necessary to use for the purposes that we tell you about. Sometimes, though, the law requires us to keep it for longer.
Marketing	We may send you information about the Product updates and enhancements that you may be interested in. If we need your consent to do that, we will only do so with your consent, and you can opt-out of such marketing communications at any time.
Sharing Your personal	We may share your personal data with other companies that are controlled by, or under common control with us, third parties such as our business partners and service providers or where we are required to do so by law. We will ensure that our business partners and service providers are subject to appropriate data protection

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KEY POINTS	SUMMARY
data with Third Parties	obligations.
Security	We take the security of your data very seriously. We have implemented various technical and organizational measures to protect your personal data.
Your Rights	<p>Some data protection laws may grant you rights in relation to your personal data, including, for example, the right:</p> <ul style="list-style-type: none"> • to be informed of how we process your personal data. • to access the personal data we hold about you, and information about their processing. • to request that we delete or update inaccurate personal data; or • to complain to the relevant regulator if you think that we have infringed any of your rights. <p>If you are living in Europe, you will have specified rights further outlined in this Privacy Policy.</p>
International Transfer	We are a global business, so we may transfer your personal data to other countries. However, we will ensure that we abide by storage localization requirements and put appropriate legal safeguards in place for such transfers.
Updates	We may update this Privacy Policy from time to time and will notify you of any updates in an adequate manner.
Contact Us	If you have any questions, you can contact us at issc@fynxt.com .

Privacy Policy

FYNXT (hereinafter referred to as “We”, “Us”, “Company” or “Our”) is mindful of the privacy of all those who use its website (hereinafter referred to as “You”, “Your” or “User”) located at <https://fynxt.com/>. The purpose of this privacy policy statement or simply “Privacy Policy” is to inform you of how ‘We’ collect, use, and disclose information about You, collected on the Site. FYNXT values your privacy and wants you to understand how we collect, handle, and share information via this Privacy Policy. This covers our practices regarding information collected by us or our service providers via the website or application (hence the “Product”) from which you are accessing this Privacy Policy. By providing personal information to us or by using the Product, you acknowledge that you have read and understood this Privacy Policy.

This Privacy Policy will help you understand the following:

A. General Provisions

- I. Responsibilities
- II. How We Collect Personal Data and What Types of Personal Data We Collect
- III. How We Use Your Personal Data
- IV. How Long We Keep Your Personal Data
- V. How We Disclose Your Personal Data
- VI. How Your Personal Data Is Transferred Globally
- VIII. How We Store and Protect Your Personal Data
- VIII. Your Rights Regarding Your Personal Data

B. GDPR Specific Provisions

- I. Legal Bases for the Processing of Personal Data
- II. Additional Information on How Your Personal Data Is Transferred Globally
- III. Additional Information on Cookies and Other Tracking Technology
- IV. Additional Information on Your Rights Regarding Personal Data

C. Disclaimer

D. Contact Us

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The general provisions of Section A shall apply to you, regardless of your location. Section B only applies to customers located in the European Union, Liechtenstein, Norway, the United Kingdom, or Switzerland ("Europe").

A. General Provisions

I. Responsibilities

This Privacy Policy explains how FYNXT, along with its affiliates (hereinafter referred to as "we", "us" or "FYNXT"), collects, uses, shares, transfers, and protects the personal data of the user (hereinafter referred to as "you") and the corresponding rights of the user. Personal data refers to any information related to a natural person that has been identified or is identifiable. Within the meaning of applicable law, we will act as a data controller when we process your personal data.

II. How We Collect Personal Data and What Types of Personal Data We Collect

The term personal data is broadly defined and means any information relating to an identified or identifiable individual. This means that not only the data that, for example, identify you directly, such as your name or address, is personal data but also other data, which when combined with other information accessible to us, enables us to link that data to you, for example, an IP address.

Our channels for collecting personal data include:

1. personal data that you provide to us directly.
2. personal data that we automatically obtain when you interact with our Product, such as information on your interactions with our Product or us, and/or.
3. personal data that we obtain about you from third parties.

The personal data we collect depends on the environment in which you interact with us and the choices you make, including your privacy settings and the features and Services you use.

Please also read the Section "How We Use Cookies and Similar Technologies" below for further information on personal data that we automatically collect via cookies and other tracking technology when you visit our website.

III. How We Use Your Personal Data

1. We will use your personal data for the following purposes:
 - to provide you with FYNXT 's Services, process your orders, or fulfil the contract between you and FYNXT.
 - to help you create and manage your Product(s) account, activate Product you have purchased, and provide notifications for Product updates.
 - to diagnose Product issues and provide other customer care and support Services.
 - to conduct customer surveys to enhance your user experience and improve our Product along with their security features.
 - to analyze the customer market on the basis of the country where the users use our Product.
 - to analyze the efficiency of our business operations.
 - to analyze error logs to improve the Product functions.
 - to communicate with you and reply to your questions or comments submitted through emails or by raising tickets.
 - to ensure the functionality and safety of our Product, verify your identity, conduct internal auditing and prevent and investigate fraud, cybersecurity threats or other improper use.

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- to enhance and develop our Product, so as to improve the product usage experience, user-friendliness, operational performance, functions and design.
 - to pursue or defend against legal claims.
 - to comply with our legal obligations.
2. When we want to use the personal data for other purposes not covered by this Privacy Policy, we will inform you thereof and make sure that said use of your personal data is lawful.
 3. We do not make any decisions involving the use of algorithms or profiling that produces legal effects or other effects that significantly affect you.

IV. How Long We Keep Your Personal Data

We will only store your personal data for as long as necessary to achieve the collection purposes set out in this Privacy Policy unless a longer retention period is required by law. If we are required by law to store your personal data beyond this period (such as for tax and commercial law reasons), we will delete the personal data at the end of this storage period.

After the expiry of the retention periods, we will delete or anonymize your personal data.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use and disclosure of your personal data, the purposes for which we process the personal data, and the applicable legal requirements.

If, after you sign up for our promotional emails, you unsubscribe from receiving our promotional emails, we will delete your personal data from our mailing lists. However, we will continue to store your email address in a blocklist to ensure that you will not receive any further communication.

V. How We Disclose Your Personal Data

We will never sell your data to third parties. We may, however, share your data with companies with whom we have a direct business arrangement to jointly serve you with FYNXT's products.

We also use third-party data processors who provide marketing and marketing automation. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organization and they will hold it securely and retain it for the period we instruct.

The legal basis for sharing these data is our legitimate interest in cost-effectively marketing our business. Further, we may disclose your personal data to certain other third parties with your consent.

VI. How Your Personal Data Is Transferred Globally

We leverage our resources and servers around the world to provide Services. This means that in compliance with applicable laws, your personal data might be transferred to or accessed from countries or regions outside of where you use our Services.

However, we will take measures to ensure that the personal data we collect is processed in accordance with this Privacy Policy and applicable laws and that your personal data is adequately protected. We will also specifically ensure that we comply with laws that require us to store data locally within a specific country or region.

VII. How We Store and Protect Your Personal Data

We are certified under ISO27001 as having put technical and organizational policies and procedures in place to secure personal data from loss, misuse, alteration, or destruction. We ensure that access to your personal data is limited only to those who need to access it and those individuals are required to maintain the confidentiality of such information. Where necessary, we apply encryption and anonymization techniques in an effort to further protect personal data.

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In addition, the security of your personal data is very important to us. We have taken reasonably practical, technical, and organizational measures in accordance with industry standards to protect personal data collected in connection with our Product/Service and prevent it from an accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. However, please note that while we have taken reasonable measures to protect your personal data, no websites, Internet transmissions, computer systems or wireless connections are absolutely secure.

Further, we only allow our employees and expert personnel to access such personal data on a need-to-know basis, in order to process such personal data or provide relevant Services to you. These employees and external personnel are subject to strict contractual confidentiality obligations. If they fail to perform these obligations, they may be held liable, and/or their relationship with FYNXT may be terminated.

Also, we carefully select our business partners and service providers and ensure that they are sufficiently bound to protect personal data and will be subject to privacy audits and assessments. Moreover, we conduct security and privacy protection training, testing, and other activities to enhance employee awareness of and proficiency in personal data protection.

In case of a personal data security incident, we will act in accordance with applicable law and notify you and/or the competent data protection authority of any such security incident where required and take measures to mitigate any risks arising therefrom.

VIII. Your Rights Regarding Your Personal Data

1. Subject to applicable laws in your jurisdiction, you may have specific rights regarding your personal data. This may include the following rights in particular:

- The right to be informed: FYNXT is publishing this Privacy Policy to keep you informed as to how we handle your personal data and what options and rights you have regarding your personal data.
- The right to access: If you wish to access your personal data, some of our Products provide an interface through which you may directly search for or access certain personal data. You may also request access to the personal data we hold about you and information about its processing by contacting us using the "Contact Us" section.
- The right to rectification: If you find that the personal data we process about you is inaccurate or incomplete, you are entitled to ask us to make rectifications without undue delay and request the completion of your personal data where appropriate.
- Unsubscribe from marketing communications: If you no longer wish to receive marketing communications, you may unsubscribe from such communications at any time using the method provided in each promotional message.

2. You may also have further legal rights concerning your personal data, depending on the jurisdiction in which you are located. In this respect, please see the GDPR-specific Section if you live in Europe.

3. If you wish to make a request, you can submit it through issc@fynxt.com.

4. Please note that, in the interest of security, we may ask you to verify your identity before processing your request.

5. Certain jurisdictions might entitle you to refer the complaint to the relevant regulatory authority if you are not satisfied with the response you received.

6. In principle, we do not charge a fee for responding to your reasonable request. However, for multiple and repetitive requests that exceed a reasonable limit, we may charge a reasonable fee to cover some of our costs, depending on the nature of the request. We are entitled to refuse requests in whole or in part, and we may refuse requests that are manifestly unfounded, unreasonably repetitive, or that require disproportionate technical effort (for instance, requests that require the development of new systems). In addition, we may not respond to requests that directly concern

significant issues of public interest or may cause serious damage to the legitimate rights and interests of you or other individuals or entities.

B. GDPR-Specific Provisions

The following provisions only apply to you if you live in Europe.

I. Legal Bases for the Processing of Personal Data

Our processing of your personal data as described in the Section "How We Use Your Personal Data" is based on the following legal grounds:

1. Consent

We may process your personal data with your consent. You have the right not to provide consent, or to withdraw it at any time. The withdrawal of your consent does not affect the lawfulness of our use of your personal data before your withdrawal. If you have granted us consent to use your personal data, we will use it only for the purposes specified in the consent declaration. Please note that to the extent our processing is based on your consent and you deny your consent or withdraw it, we may not be able to provide the service relating thereto. Besides that, neither the initial denial nor a withdrawal will have any negative consequences for you.

2. Perform or enter a contract with you:

We rely on this legal basis in the following cases:

- to provide you with FYNXT's Services, process your orders or fulfill the contract between you and FYNXT;
- to help you create and manage your account, activate Services you have purchased, and provide notifications for Product updates;
- to diagnose product issues, repair customer equipment and provide other customer care and support Services.

3. Compliance with a legal obligation

FYNXT may be obliged to process personal data to comply with our legal obligations, for example where FYNXT is required to retain data for tax law or commercial purposes.

4. Legitimate interests

The processing of your personal data may also be necessary for FYNXT 's legitimate interests. In particular, such cases may include the following:

- to conduct customer surveys to enhance your user experience.
- to analyze the customer market based on the country where you use our Services, including the number of users for product marketing and promotion.
- to analyze the efficiency of our business operations.
- to provide you with personalized Services and to recommend.
- to communicate with you and reply to your questions or comments submitted to us by any means;
- to ensure the functionality and safety of our Services.
- to verify your identity.

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- to conduct internal auditing and to prevent and investigate fraud, cybersecurity threats or other improper use;
- to enhance and develop our Product, including relevant security features, so as to improve the product usage experience, user-friendliness, operational performance, functions and design;
- to pursue or defend against legal claims.

Your personal data will only be processed on the above grounds after we have appropriately assessed and balanced our interests against your right to privacy.

II. Additional Information on How Your Personal Data Is Transferred Globally

In case your personal data is transferred to jurisdictions located outside of Europe, we will ensure that appropriate safeguards exist and are applied, such as

1. the recipient of the personal data is located within a country that benefits from an "adequacy" decision of the European Commission.
2. the recipient has signed a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data.
3. or in the absence of the above appropriate safeguards, we will ask you for your explicit consent for the cross-border transfer of your personal data or take any other measures that are recognized as providing a sufficient level of protection for your personal data.

For more information about the safeguards relating to personal data transfers outside of Europe, please submit your request via issc@fynxt.com.

III. Additional Information on Cookies and Other Tracking Technology

If you wish to obtain detailed information on the use of cookies and other tracking technology, please read our Cookies Statement.

IV. Additional Information on Your Rights Regarding Personal Data

Subject to the legal requirements under the GDPR, you have the following rights:

1. The right to access: You may request access to the personal data we hold about you.
2. The right to rectification: If you find that the personal data we process about you is inaccurate or incomplete, you are entitled to ask us to make rectifications without undue delay and to request the completion of your personal data where appropriate.
3. The right to erasure: You can submit a request to us to delete personal data, and we shall have the obligation to erase it without undue delay in some circumstances – for example, if we do not have a legal reason to continue to process the personal data to the extent required by applicable laws and regulations. Also, we encourage you to contact us to request that your personal data be deleted.
4. The right to restriction of processing: You have the right, in certain circumstances, to request FYNXT to temporarily restrict the processing of your personal data, such as where the accuracy of that personal data is contested by you, while we verify the accuracy of that personal data. We will keep just enough data, or process such data as is necessary to ensure that we comply with your restriction request in the future.

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5. **THE RIGHT TO OBJECT:** You have the right to object to any processing justified by legitimate interests based on grounds relating to your situation at any time. Should you decide to object to the processing of your personal data, we will stop processing personal data that concerns you, unless we can demonstrate compelling reasons for continuing to process your personal data that override your interests, rights, and freedoms, or in the case that we establish, exercise or defend our legal claims.
6. **The right to withdraw consent:** If you have given us your consent to process your personal data but change your mind later, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of our use of your personal data before your withdrawal. If you want to withdraw your consent about receiving promotional communications, you can unsubscribe through the method described in each promotional message. If you withdraw your consent, we may no longer be able to provide you with the corresponding Service.

C. Disclaimer

Company shall not be liable for any loss or damage incurred as a result of any disclosure (inadvertent or otherwise) of any information concerning the user’s account and/or their verification process and particulars, nor for any error, omission, or inaccuracy concerning any information so disclosed and used, whether or not in accordance with a legal process or otherwise. The company has the right to amend the terms of this agreement at any time. The company is free to offer its services to any client/prospective client.

By registering or using this Site, you expressly consent to the collection, use, and transfer of the Personal Information you supply in the way indicated in this Privacy Policy, without restriction or qualification.

Please read this Privacy Policy carefully because it impacts your legal rights and liabilities. Please do not use the Site if you do not accept the Privacy Policy described therein or if you disagree with how we gather, and process personal information collected on it.

D. Contact Us:

If you have a complaint about our use of your information, you can contact the Information Security Steering Committee via the website at issc@fynxt.com or write to them at:

Information Security Steering Committee
 Simptra Technologies Pvt Ltd
 India Branch Office
 1008-1009 Swastik Universal Building,
 Dumas Rd, New Magdalla,
 Surat, Gujarat 395007.

Revision History

Version No. Date	Revision Details	Prepared By	Reviewed By	Approved By
V1.0 01.06.2022	Fresh release of the Policy w.r.t ISO 27001:2013 & EU GDPR	IT Infra Admin	ISSC	CEO
V2.0 14.10.2022	Company name changed from FYNXT to Simptra Technologies Pvt. Ltd.	PMO	ISSC	CEO

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INFORMATION SECURITY MANAGEMENT SYSTEM (ISMS) POLICY

Simptra Technologies Pvt. Ltd. is a wholly owned subsidiary of Tech4JC Pte. Ltd. (Trade name FYNXT), which is a Singapore-based fintech organization that empowers Financial Institutions with the Next-Gen Digital Front Office Platform.

The Management of Simptra Technologies Pvt. Ltd. recognizes the importance of developing and implementing an Information Security Management System (ISMS) and considers security of information and related assets as fundamental for the successful business operation. Therefore, Simptra Technologies Pvt. Ltd. is committed towards securing the Confidentiality, Integrity and availability of information for the day-to-day business and operations.

Simptra Technologies Pvt. Ltd. has adopted an Information Security Management System (ISMS) comprising of the Information Security Policies, Procedures and Processes to effectively protect data / information of Simptra Technologies Pvt. Ltd. and its customers from information security threats, whether internal or external, deliberate or accidental. ISMS in Simptra Technologies Pvt. Ltd. is aligned to the requirements of ISO/IEC 27001: 2013.

The Top Management of Simptra Technologies Pvt. Ltd. is committed to ensure that:

- Regulatory and legislative requirements related to Simptra Technologies Pvt. Ltd. are met.
- The confidentiality of information is protected and prevent disclosure of valuable or sensitive information.
- The integrity of information is maintained to ensure its accuracy and completeness.
- The availability of information is maintained to meet business needs and client's requirements.
- Business continuity plans are developed, maintained and tested.
- Information security awareness is provided to all Simptra Technologies Pvt. Ltd. employees.
- Incident management process is established and implemented to ensure that all breaches of information security, actual or suspected are reported and investigated.
- Risks are mitigated to an acceptable level through a Simptra Technologies Pvt. Ltd.'s Risk Management policy.
- The information security management system is continually improved.
- Appropriate resources are allocated in order to implement, operate and review an effective Information Security Management System.
- All stakeholders are responsible for implementation of respective security policies and procedures within their area of operation, and oversee adherence by their team members.

By implementing ISMS, Simptra Technologies Pvt. Ltd. will assure all interested parties that an appropriate and effective information security management system is in place.

Simptra Technologies Pvt. Ltd. shall follow a formal disciplinary process for employees who have allegedly violated the information security policies and procedures.

Simptra Technologies Pvt. Ltd. shall ensure that the review of the Information Security Policy and related documents is performed at least on an annual basis or when significant changes occur to ensure suitability, adequacy, and effectiveness of the ISMS framework.

Reviewed & Approved By,

Mr. Aeby Samuel
 CEO & Founder
 Simptra Technologies Pvt. Ltd.