

PRIVACY POLICY

Our Commitment

We at Green Portfolio Private Limited (hereafter referred to as “GPPL”) is strongly committed to the data subject's ("you", "your", "subscriber", "user") right to privacy and to keeping your personal and financial information secure. To earn your trust and confidence in our commitment, we are fully disclosing our privacy practices. We encourage you to read our privacy policy to understand to understand what personal data we may collect and how we use this information. The reference to shall also include its applications.

This privacy policy describes the usage of information provided or collected on the sites and applications where this privacy policy is posted. We follow this privacy policy as per applicable law of land. In some cases, we may provide additional data privacy notices specific to certain services or regions. Those terms are to be read in combination with this policy.

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via social media login) this collected information is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our sites or applications. Please note that our sites and applications may contain links to other websites not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your personal information.

This Privacy Policy should be read in conjunction and together with the Terms of Use applicable to the service (website, application or other service) you are using.

User Consent

By using Our website (for example, when you register for an account, purchase a service, enter a contest or promotion, communicate with us), you agree to our collection, use and sharing of your personal information as described in this policy. In some cases, particularly if you reside in a country governed by a data protection regulation, we may ask you to provide us with the explicit consent to access our services before proceeding for further operations. In case of any roaming user profile or if you are a traveller visiting various countries around the world and avail GPPL services, then we will consider the country of registration as your primary country and the consents obtained at the time of registration will be valid for processing of personal information. The privacy terms applicable as per the law of that country while registering will be applicable to you.

Accessing Website through VPN

You should not access or use the our Website Services by means of any mechanism or technology which conceals your actual geo-location or provides incorrect details of your location (for example, use a virtual private network (VPN) to access the Services).

We will not be responsible or liable for any collection, storage or processing of your personal information or data if you use any mechanism or technology to access or use Website or Services which conceals your actual geo-location.

Collection of Personal Information and it's use

'Personal Information' defined as any information that identifies (whether directly or indirectly) a particular individual or natural person, cover the following points including individual's name, postal address, email address, and mobile number indicating to that particular person or is identifiable. When anonymous information is directly or indirectly associated with personal information, the resulting information can also be treated as personal information.

We only collects the necessary personally identifiable information in order to respond to your requests for our customized products and services.

Green Portfolio Private Limited (“GPPL”) does not collect personally identifiable information about you except when you specifically and knowingly provide it. Green Portfolio and its service partners use your personally identifiable information to operate the sites and services and to inform you of new features, services, and products from our website.

I. Information you provide to us

We may ask for and collect the following personal information about you when you use the We and without this information. we may not be able to provide you with all the requested services;

a. Registration Data

To use certain features on the website, Application and for the Services (such as event registrations and website campaigns), you may provide basic contact Information, including but not limited to:

1- First Name

2- Last Name

3- Email Address

b. User profile details

We may further collect and record the following personal information under the "My Profile" section, which helps us provide customized feeds and maintain a user profile, including but not limited to:

1-Name

2-Gender

3-Email ID

4-Date of birth

5-Country

6-City

7-Occupation

8-Industry

9-Annual Income

10-Mobile Number

c. User portfolio details

In addition to the above, the user may also create a "Portfolio" by providing the financial details regarding the following:

Stocks

Mutual Funds

ULIPs

Bullion

Fixed income

Loans

Property

Asset details etc.

D. Mobile device permissions

When accessing our application on mobile devices/ tablets/ TVs or any other device having access of the said application, we may request and gain access to the following:

Accounts - Used for managing multiple user accounts within the app and for Login purposes.

Contacts - Used for accessing users Contact in order to share articles through the app.

Camera - In order for the user to upload images and profile image of the User. Let's user use Camera inside.

Phone - To read phone state and enable user notifications on user's device. IMEI is being collected to uniquely identify every user only.

Storage - To access files folders from inside the App.

SMS - To send and receive verification messages.

Microphone - To enable voice command related actions

Permissions to these settings may be essential in adequate running of the application. Permissions can be managed through the respective user devices using the "settings" option.

II. Information you provide to us voluntarily

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the We , we may collect and store such information.

We may collect additional information at other times, when you provide feedback(s), modify your content or email preferences, respond to surveys, or communicate with us. This information may include your name, e-mail id, mobile number, location, etc.

III. Information we collect automatically

We can also collect information about you and your use of our service, your interactions with us and our advertising, as well as information regarding your computer or other devices used to access our service (such as mobile devices, tablets and other viewing devices). This information includes, but is not limited to:

Activities on our website such as type of pages viewed, time spent on pages, search queries etc. Your interactions with our email, customer care and messaging platform. Geo-location information through IP addresses;

Device information like device id, device model etc. and other unique identifiers

Advertising identifiers, such as those found on mobile devices & tablets, devices that include identifiers(for example the Identifiers for Advertisers (IDFA) on iOS devices and GAID on Android devices);

Information collected via the use of cookies and other technologies. For more details you can refer to our Cookie Policy.

IV. Inferred Information through usage and log data

We may track certain information about you based upon your behaviour on the We . We use this information for conducting internal research on our users' demographics, devices, interests, and behaviour to better understand, protect and serve our users. This information is compiled and analysed on an aggregated basis.

We may also collect Your Information to track user behaviour and preferences for internal analytics and research. We may also use your information:

- (i) To evaluate Your interest for investment options, services, offers, subscriptions;
- (ii) To perform analytics and conduct customer research, to determine your interest, for identifying content that generate sales and to analyse traffic patterns.

a. Interactive features

Our website having many features that provide for users/members to disclose their identities and communicate with other users/members.If you do disclose your personal details through these features then you will at your sole risk and We have no responsibility for the same. However, if your privacy has been intruded as a result of participating in such features, you could notify us by e-mail us.

b. User Experience and Support

We identify and use Your IP address to help diagnose any problems with our server, and to administer our application. Your IP address is also used to help identify you and to gather broad demographic information to customize your experience.

We will occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, etc.). We use this data to provide with better experiences, providing you with content that we think you might be interested in and to display content according to your preferences.

V. Information we collect through third parties

a. Social Media Login

When you register using your other accounts like on Facebook, Gmail etc. we shall retrieve Information from such accounts to continue to interact with you and to continue providing the Services. We collect information like

Google - First name, Last name, Email id

Facebook - Public information, Name, Email id, friend list

b. Transactional or Billing Information

Based on Your subscription package purchased , our payment gateway partner may collect information with respect to your credit/debit card details or other bank account details along with your billing address. This information is stored by our payment gateway partner. For instance, the Services will be using third party payment gateway partners to process and facilitate the payment of your subscription fee to the Services for providing you access to the subscription. Please note that We does not directly collect any financial information such as credit card or debit card or net banking details from you. Such payment gateway partners are not controlled by us. When you visit such payment gateways you do so at your own risk. These payment gateways may have their own privacy policies in place, which we recommend you review if you visit any such payment gateways.

c. Financial Information

For provision of services and subscriptions, you may be required to present additional financial or sensitive personal information to our partners, on their respective websites (e.g. PAN card details for mutual funds). You understand, agree and acknowledge that We does not process any information provided on partner/vendor websites. Your Personal Information, Sensitive Personal Data or Information and financial information will be dealt by these partners in accordance with their respective privacy policies and other terms and conditions an We are not be liable, accountable or responsible for Your Personal Information, Sensitive Personal Data and Financial Information which you provide to these payment gateways. We may however receive a copy of such information (e.g. PAN numbers, transaction IDs and details) provided by you to third parties solely for the purpose of reconciliation and validation of transaction, or for the purpose of resolution of complaints such as a transaction failure, processing of refunds, only as permissible by the local law.

d. Auto renewal Subscription

When you chose any subscription or paid service, we or our payment gateway provider may collect your purchase, address or billing information, including your credit card number and expiration date etc. These Services may be on auto renewal mode unless cancelled. If you do not wish to auto-renew your subscription, you may cancel your subscription before the end of the subscription.

e. Information from other Sources

We may receive information about you from other sources, add it to our account information and treat it in accordance with this policy. If you provide information to the platform provider or other partner, whom we provide services, your account information and order information

may be passed on to us. We may obtain updated contact information from third parties in order to correct our records and fulfil the Services or to communicate with you. Demographic and purchase information: We may reference other sources of demographic and other information in order to provide you with more targeted communications and promotions, based on the consents provided by you.

II. Purposes and Lawfulness of processing

We will only collect and process personal data about you where we have lawful basis. Lawful basis on which we would process your personal information includes obtaining explicit consent from you for processing your personal information or processing for "legitimate interests" where processing is necessary by us to provide you with customer support or process your data for providing premium services.

We use information so as to provide, analyse, administer, and personalize our service and marketing efforts, to process your registration, your orders, payments, and to communicate with you.

III. Information used by the company

The Information as supplied by the users enables us to improve the Services and provide you the most user-friendly experience. In some cases/provision of certain service(s) or utility (ies), we may require your contact address as well. All required information is service dependent and the Company may use the above said user Information to, maintain, protect, and improve the Services (including advertising on the "Application") and for developing new services. We may also use your email address or other personally identifiable information to send commercial or marketing messages with your consent, as applicable by local laws [with an option to subscribe / unsubscribe (where feasible)].

Any personally identifiable information given by you is not to be considered as sensitive if it can be freely accessed or available in the public domain like any comments, messages, blogs, scribbles available on social platforms like Facebook, twitter etc. Any posted/uploaded/conveyed/communicated by users on the public sections of the website or the Application becomes published content and is not considered personally identifiable information subject to this Privacy Policy. In case you choose to decline to submit personally identifiable information, we may not be able to provide certain services to you. In any case, we will not be liable and or responsible for the denial of certain services to you for lack of you providing the necessary personal information. When you register with the Application or Services, we contact you from time to time about updating your personal information to provide the users such features that we believe may benefit interest you.

IV. Disclosure to third parties

a. General Disclosure

At times We may make certain personal information available to strategic partners that work with us to provide service, or that help our customers. For example, when you purchase and activate subscription, you authorize have to exchange the information you provide while in activation process so as to carry out a service. If you have approved the service, then your account is to be governed by our privacy policy. Personal information will only be shared and used by us to provide or improve our service and marketing aspects; it will not be shared with third parties for their marketing purposes.

We carefully select companies to send you information about their products or services which may be related to the site's service but are not necessary to its operation (referred to "Extended Service"). If we intends to use personally identifiable information for an Extended Service, then we also will provide you with the ability and requisite instructions to decline this service. You may also stop the delivery of informational or promotional mail from We by following the instructions on the mail.

b. Advertising

We may use third-party advertising companies to serve ads when you visit our websites or Applications. These companies may use information (including your name, address, email address or telephone number or any other personally identifiable information) about your visits to this and other websites or application, in order to provide advertisements about goods and services of interest to you. We do not provide any personally identifiable information to third party websites / advertisers / ad-servers without consented by you.

c. Service Providers

We may include links to various third-party websites that may collect Your Personal Information. Use of Your information collected by such third-party platform will be governed by the privacy policy in such third-party platform. Such websites or applications are governed by their respective privacy policies, which are beyond our control. Their privacy policy may differ from ours. If you are unable to find the privacy policy of any of these sites via a link from the application's homepage, you can contact the application owners directly for more information.

We may share non-personally identifiable information publicly with our partners - like publishers, advertisers, developers, or rights holders. We also allow specific partners to collect information from your browser or device for marketing/promotions and measurement purposes using their own cookies or similar technologies.

D. Promotional Offers

We'll share or disclose your personal information outside of our website when we have your consent. For example, providing SMS and E-mail related services such as marketing newsletters, promotions and offers.

E. Business Transfers

We provide personal information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we may use service providers to help us with customer support.

In the event Green Portfolio Pvt Ltd is merged with or acquired by another company or in case of re-organization or re-structuring of business, we and our affiliates may share your personal information, wholly or in part, with another business entity.

F. Legal

We may disclose personally identifiable information if required to do so by law or in the good-faith belief that such action is necessary to:

Comply with law or legal process served on the site or its owners;

Protect and defend the rights or property of the site-owners, the site or the users ;

Act under exigent circumstances to protect the personal safety of our users , the site, its owners, or the public.

V. Your Controls and Choices

Managing Your Information

When you use the Services from our website, we make good efforts to provide you, as and requested by you, access to your personal information and shall further ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible, subject to any requirement for such personal information or sensitive personal data or information to be retained by law.

We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or extremely impractical or for which access is not otherwise

required. In any case, where we provide information access and correction, we perform this service free of charge. Because the manner we maintain certain services, after even you have deleted your information, residual copies may take a period of time before they get deleted from our active servers and may remain in our backup systems.

While exercising rights applicable to you as a data subject, you must write to us and raise a request for the specified right. You are requested to use appropriate subjects to mention the right (e.g. Data Access Request, Data Portability Request, Data Deletion Request) while raising all such requests, this would help us process your requests in a faster and more efficient manner.

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your personal information as per applicable law, your controls and choices may include:

a. Data Access and Portability

The EU - General Data Protection Regulation) entitles you, as the data subject, to request copies of your personal information held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured or machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

b. Rectification of Inaccurate or Incomplete Information

You can ask us to correct inaccurate or incomplete personal information concerning you (this is the information which you cannot update yourself within your account) by sending us an e-mail.

You can access and update some of your personal information through your account settings. If you have chosen to connect your profile to a third-party application, like Facebook or Google, you can change your settings and remove permission for the app by changing your account settings. You are responsible for keeping your personal information up-to-date.

c. Data Retention and Erasure

We retain your personal information as long as necessary for the legitimate interests specified in this policy and for us to comply with our legal obligations. If you no longer want us to use your information then you can request that we erase your personal information and close your account.

Please note that if your request for the erasure of your personal information;

We may retain your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend an account for fraud or safety reasons, we may retain certain information from that account to prevent that user from opening a new account in the future.

We may retain and use your personal information which we may think necessary to comply with our legal obligations. For example, we may keep some of your information for tax, legal reporting and auditing obligations.

Information you have shared with others (e.g., Reviews, forum postings) may continue to be publicly visible on our website, even after your account is cancelled. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers.

Because we maintain copies of personal information to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

d. Withdrawing Consent and Restriction of Processing

For withdrawing your consent at any time during the tenure of your services with us, you may choose to do so by sending us an e-mail. We shall review your request and may ask you to verify your identity. Post verification we will withdraw the consent for which request was made by you and stop any further processing of your personal information

e. Objection to Processing

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an e-mail to us.

Please be aware that if you do not allow us to collect personal information from you, we may not be able to deliver certain experiences, products, and services to you, and some of our services may not be able to take account of your interests and preferences. If collection of personal information is mandatory, we will make that clear at the point of collection so that you can make an informed decision whether to participate. If you have questions about the specific personal information about you that we process or retain, and your rights regarding that personal information, please contact our customer support team.

VI. If you fail to provide consent

It is our duty to inform you that this is an ad-serving platform. Advertisements form the core of our business, therefore permissions to use and process your personal information to provide advertisements is essential for us to provide services to you. Use of personal information for ad-serving is a binding criterion and we will not be able to provide you with Our services if you fail to authorise us to use your personal information for the purpose of ad-serving and the activities related to it.

VII. Children's Privacy

We are not intentionally designed for or directed at persons less than 16 years of age. Green Portfolio Private limited does not permit any person below 16 years of age to register with the services or to provide any other personally identifying information. If we become aware that any information about any children less than 16 years of age has been collected without verified parental consent, will take the appropriate steps to delete any such information and notify the parent.

However, we consider it the responsibility of parents to monitor their children's use of our services. Nevertheless, it is our policy not to collect and process any personal information from children below 16 years of age or offer to send any promotional materials to persons in that category.

VIII. Data transfer, storage & processing

We may transfer your personal information to other affiliated companies or third parties in locations around the world for the purposes described in this privacy policy. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. Additionally, when using or disclosing personal information transferred from the European Union, we use standard contractual clauses approved by the European Commission, adopt other means under European Union law for ensuring adequate safeguards.

IX. Security and compliance with laws

We continuously implement and update administrative, technical, and physical security measures to protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards like firewalls and data encryption, and information access controls. If you know or have reason to believe that your account credentials have been lost, stolen, altered, or otherwise compromised or in case of any actual or suspected unauthorized use of your account, please contact us by contacting our customer support team.

X. Change in Policy

This Privacy Policy is subject to change from time to time. We reserve the right, at our sole discretion, to modify the terms and conditions of this Privacy Policy from time to time in order to ensure compliance with applicable laws ("Updated Terms"). The Updated Terms shall be effective immediately and shall supersede the terms of this Privacy Policy. You will be notified with any change to this privacy policy if the changes made to the policy significantly affects your rights or as may be required by law. You shall be solely responsible for reviewing the Privacy Policy from time to time for any modifications. By continuing to use our updated Terms that have been published, you affirm your agreement to the updated terms.

