<u>Assam_Cooperative Apex Bank PPS Mobile App Privacy Policy</u>

1. Introduction

Welcome to the Positive Pay System mobile app of The Assam Cooperative Apex Bank Ltd. (hereinafter referred to as "we," "us," "our," or the "App"). This Privacy Policy outlines how we collect, use, share, and protect your personal information when you use our mobile app specifically designed for the Positive Pay System (PPS) mechanism. By accessing or using our App, you give your consent to the practices described in this policy. We want to make sure that you understand that we treat information provided/received from you with utmost importance and under no circumstances will compromise with it. Our server only collects information such as IP address, demographics, Operating System, browser or domain name from where the visitors are accessed but never the email addresses. This information is collected to serve purpose of calculating total number of visits on the mobile app, average time spent, number of pages viewed etc. Gathered input is used by the company to improve relevance and experience of users on our mobile app, usability, and troubleshooting. By accessing our site you unconditionally accept us to collect these inputs.

2. Information We Collect

2.1 Personal Information for Positive Pay System

We may collect the following types of personal information from you specifically for the Positive Pay System:

- Name
- Account Number
- Cheque Number
- Cheque Date
- Payee Name
- Cheque Amount
- Any other relevant check details required for the Positive Pay System process defined by regulatory authority

During registration, the user must provide with mandatory information; failing to which will normally terminate the registration process.

2.2 Non-Personal Information

We may also collect non-personal information such as anonymous usage data, device identifiers, and aggregated data that cannot be used to identify you personally. This information is used to improve our services and enhance the user experience.

3. How We Use Your Information

3.1 Use of Personal Information

We use the personal information collected for the following purposes related to the Positive Pay System mechanism:

- To process and verify the details submitted by you
- To authenticate your identity for Positive Pay submissions
- To communicate with you regarding Positive Pay System updates and notifications
- To comply with legal and regulatory requirements related to the Positive Pay System

3.2 Use of Non-Personal Information

Non-personal information may be used for analytical and statistical purposes to improve our Positive Pay System services and the overall user experience.

4. Information Sharing & Disclosure

Assam Cooperative Apex Bank Ltd. only shares information with those maintaining high standard of data privacy and security. However, we aren't responsible for the privacy policies employed by third-party sites.

4.1 Positive Pay Processors

We may share your personal information with trusted third-party processors and financial institutions involved in the Positive Pay System process for verification and check clearing purposes. These processors are contractually obligated to maintain the confidentiality and security of your information.

4.2 Legal Compliance

We may disclose your personal information as required by applicable laws, regulations, or court orders to protect our rights or respond to legal requests related to the Positive Pay System.

4.3 Affiliates & Service Providers

We may share your personal information with our affiliates and trusted service providers who assist us in offering the Positive Pay System and other mobile banking services. Such sharing will be subject to strict confidentiality and data protection agreements.

5. Security & Data Retention

We implement robust security measures to protect your personal information for the Positive Pay System from unauthorized access, alteration, disclosure, or destruction. Your data will be retained as per the applicable laws and regulations, and we will dispose of it securely when it is no longer required for the purposes mentioned in this policy.

6. Your Choices

Within the scopes of local laws you have the right to access, update, or delete your personal information in our records related to the Positive Pay System, it can be done from your account information. In case, you face difficulties in accessing your data please contact us at it@apexbankassam.com /dgmit@apexbankassam.com for assistance.

7. No Obligation Policy

You recognize that you are under no obligation to provide your personal information but when you do, it is with your full consent, volition and desire. Assam Cooperative Apex Bank Ltd. under no circumstances is obligated to disclose sources from where personal information about you is provided to us. We would consider it to be provided by you unless you successfully prove to us, to our satisfaction, within fifteen days time, that the information was offered without your free consent.

8. Changes to this Privacy Policy

We may update this privacy policy from time to time to reflect changes in our Positive Pay System practices or for other operational, legal, or regulatory reasons. Any updates will be posted on this page, and the effective date will be revised accordingly.

9. Contact Us

If you have any questions, concerns, or requests regarding this privacy policy or our use of your personal information for the Positive Pay System mechanism, please contact our it@apexbankassam.com/dgmit@apexbankassam.com