



CUSTOMER PRIVACY POLICY

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1. Introduction

India Post Payments Bank (IPPB) (henceforth referred as “the Bank”) recognizes that one of its fundamental responsibilities is to ensure that the Bank protects personal information entrusted to the Bank by its customers. The Bank endeavors to safeguard and ensure the security of the information provided by the customer. The Bank is strongly committed to protecting the privacy of its customers and has taken all necessary and reasonable measures to protect the confidentiality of the customer information. The Bank may disclose confidential information to the extent required by law, legal process or by any governmental or regulatory authority to which the customer is or becomes subject or in connection with an examination of the customer by any such authority. The Bank shall not be held liable for disclosure of the confidential information when in accordance with this privacy policy or in terms of the agreements, if any, with the customers.

This Policy governs the way in which the Bank collects, uses, discloses, stores, secures and disposes of personal information.

2. Key Elements of the Customer Privacy Policy

2.1. Statements of Practices and Policies

- 2.1.1. In this Policy, personal information means any information that relates to a natural person, which either directly or indirectly, in combination with other information available or likely to be available with the Bank, is capable of identifying such person;
- 2.1.2. This information is collected and used for specific business purposes or for other related purposes designated by the Bank or for a lawful purpose to comply with the applicable laws and regulations;
- 2.1.3. The Policy is in compliance with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules 2011 (the “IT Rules”) contained in the Information Technology Act 2000.

2.2. Applicability

- 2.2.1. This policy shall be applicable for all the below mentioned parties:
 - A potential customer who enquires about Bank’s products and services;
 - A customer who has established a relationship with the Bank;
 - A visitor of the Bank’s web site
- 2.2.2. This Policy is applicable to personal information and sensitive personal data collected by the Bank directly from the customer or through the Bank’s online portals, electronic communications as also any information collected by the Bank’s server from the customer’s browser;

- 2.2.3. Any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as personal information for the purposes of this Policy and the Bank shall not be responsible for the same.

2.3. Defining “Personal Information”

- 2.3.1. "Personal information" means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

2.4. Defining “Sensitive Personal Data or Information”

- 2.4.1. "Sensitive personal data or information" of a person means such personal information which consists of information relating to: -
- Password;
 - Financial information such as bank account or credit card or debit card or other payment instrument details;
 - Physical, physiological and mental health condition;
 - Sexual orientation;
 - Medical records and history;
 - Biometric information

2.5. Accuracy

- 2.5.1. The Bank shall take all steps in place to ensure that the personal information (henceforth 'personal information' shall also mean to include 'sensitive personal data' wherever not mentioned separately) provided by the customers, residing with it is complete, accurate and current. If at any point of time, the customer provides any information that is untrue, inaccurate, not current or incomplete, or the customer has a reason to believe that personal information residing with the Bank is incorrect, the customer shall inform the Bank in this regard. The Bank shall, then, correct the erroneous information as quickly as possible. The Bank shall not be responsible for authenticity of data provided by the customer.

2.6. Purpose of Collection and Usage of Personal Information and Sensitive Personal Data

- 2.6.1. The Bank shall use the information collected to manage its business, and offer an enhanced, personalized online experience on its website. Further, it shall enable the Bank to:
- Process applications, requests and transactions;

- Maintain internal records to comply with guidelines and regulations that govern the financial services in the country;
 - Provide services to customers, including responding to customer requests;
 - Comply with all applicable laws and regulations;
 - Identify and recognize customers for when they login and conduct online banking;
 - Understand the needs and provide relevant product and service offers;
 - Conform to legal requirements or comply with legal processes to protect and defend the Bank or its affiliates' rights, interests or property.
- 2.6.2. If a customer does not wish to provide consent for usage of its personal information or sensitive personal data, or later withdraws the consent, the Bank shall have the right not to provide services or to withdraw the services for which the information was sought from the customer.

2.7. Disclosure / Sharing of Information

- 2.7.1. The Bank shall not disclose personal information of its customers without their prior consent unless such disclosure has been agreed to in a contract between the body corporate and customer, or where the disclosure is necessary for compliance of a legal obligation. In-case the Bank discloses the personal information to Third Parties, such Third Parties shall be bound contractually to ensure that they protect customer personal information in accordance with applicable laws.
- 2.7.2. Further, the Bank may link to third parties, either directly or through websites of third parties. These third parties (and their websites) may collect personal information about customers. IPPB Privacy Policy does not extend to these external websites and third parties. Please refer to these third parties and websites regarding their privacy policies.
- 2.7.3. The above obligations relating to sharing of personal information shall not apply to information shared with government mandated under the law to obtain such information or by an order under law for the time being in force. Further, if any personal information is freely available or accessible in the public domain, the Bank shall not have any obligations regarding the same.
- 2.7.4. Cookies:
- 2.7.4.1. Cookies, web beacons and other technical methods may involve the transmission of information either directly to the Bank or to another party authorized by the Bank to collect and use information on Bank's behalf. The information from use of these technical methods may be collected in a form that identifies the customer personally. Customer may get cookies from the Bank's advertisers. The Bank does not control these cookies, and once the customer has clicked on the advertisement and left the Bank's Website, Bank's Privacy Policy shall no longer apply;

- 2.7.4.2. Some of the Bank's web pages including its third party service providers store and use "cookies" so that the Bank can serve its customers better, with customized information when the customer returns to the Bank's website. Cookies are identifiers which a web site can send to customer's browser to keep on customer's computer to facilitate customer's next visit to the Bank's website. The customer can set its browser to notify him / her when he / she is sent a cookie, giving customer the option to decide whether or not to accept it. The information collected and analyzed by the Bank is used to improve the service provided to the customer. Customer agrees that the Bank or the third party service providers collect customer's IP address or other unique identifiers. At times, the Bank also use these identifiers to collect information regarding the frequency with which its customers / guests visit various parts of its websites. Bank, either through itself or through its affiliates or group companies may combine customer's IP address with other personally identifiable information for marketing and for market research purposes, including internal demographic studies, so that the Bank can optimize its products and services and customize its website from time to time, for the customers and /or other such purposes as the Bank may require.
- 2.7.5. No specific information about customer accounts or other personally identifiable data shall be shared with non-affiliated third parties unless any of the following conditions is met:
- To help complete a transaction initiated by the customer;
 - To perform support services through an outsourced entity provided it conforms to the Privacy Policy of the Bank;
 - The customer / applicant has specifically authorized it;
 - Conform to legal requirements or comply with legal process;
 - The information is shared with Government agencies mandated under law;
 - The information is shared with any third party by an order under the law;
 - Protect and defend Banks' rights, interests or property;
 - Enforce the terms and conditions of the products or services;
 - Act to protect the interests of the Bank, or its members, constituents or of other person.
- 2.7.6. The Customer authorizes the Bank to exchange, share, part with all information related to the details and transaction history of the Customers to its Affiliates / banks / financial institutions / credit bureaus / agencies/participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis and credit scoring, verification or risk management and shall not hold the Bank liable for use or disclosure of this information

2.8. Security Practices

- 2.8.1. The security of personal information is a priority and shall be ensured by maintaining physical, electronic, and procedural safeguards that meet applicable laws to protect customer information against loss, misuse, damage and unauthorized access, modifications or disclosures.
- 2.8.2. The Bank shall educate its employees on their responsibility to protect the confidentiality of customer information. Employees shall be trained in the proper handling of personal information of the Bank's customers. The bank shall ensure that its employees respect the confidentiality of any personal information held by the Bank. Any violation of this privacy policy by the Bank's employees shall invite disciplinary action;
- 2.8.3. When other companies are used to provide services on behalf of the Bank, it shall ensure that such companies protect the confidentiality of personal information they receive in the same manner the Bank protects.
- 2.8.4. The Bank shall continuously review and enhance its security policies and security measures to consistently maintain a high level of security.

2.9. Notice of Amendments in the Policy

- 2.9.1. The Bank shall reserve the right to change or update this Policy, at any time with reasonable notice to customers on the Bank's website so that customers are always aware of the information which is collected, for what purpose the Bank uses it, and under what circumstances, if any, the Bank may disclose it.
- 2.9.2. By virtue of this privacy policy, the customer assents to collection, use, transfer, disclosure, retention and other processing of her / his personal information, including sensitive personal information, as described in this Policy.

2.10. Response to Enquiries and Complaints

- 2.10.1. The Bank shall encourage customer enquiries, feedback and complaints which will help it identify and improve the services provided to the customers.

2.11. Customer Confidentiality Obligations

The scope of the secrecy law in India has generally followed the common law principles based on implied contract. The bankers' obligation to maintain secrecy arises out of the contractual relationship between the banker and customer, and as such no information should be divulged to third parties except under circumstances which are well defined. The following exceptions to the said rule are normally accepted:

1. Where disclosure is under compulsion of law
2. Where there is duty to the public to disclose
3. Where interest of bank requires disclosure and
4. Where the disclosure is made with the express or implied consent of the customer.

Banks shall treat the information collected from the customer for the purpose of opening of account as confidential and not divulge any details thereof for cross selling or any other purposes.

3. Policy Revision

- 3.1.1. The policy will remain in force till further review and amendments / modifications by guidelines of RBI and the Board of Directors as and when necessary.
- 3.1.2. This policy shall undergo an annual review and approval process by the Board. If any change in this policy is subsequently approved, consequent upon any change in regulatory guidelines, market conditions, etc., such changes and approvals shall be deemed to be part of the policy until the policy and framework are comprehensively reviewed. All such interim changes shall be approved by the Board. The reviewed policy should be made available for information of all employees.

Effective Date
29th September, 2022

Annexure I - Glossary

Term	Description
IPPB	India Post Payments Bank
RBI	Reserve Bank of India

Annexure II – References

Sr. No.	Reference	Description
1	RBI Master Circular DBR No. Leg. BC. 21/09.07.006/2015-16, dated 1st July, 2015	Master Circular on Customer Service in Banks, consolidating the important instructions issued by RBI in the area of customer service up to date.