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1. [WHO IS PAYU INDIA INNOVATIONS PRIVATE LIMITED AND HOW DOES THE PAYU INNOVATIONS PRIVACY STATEMENT WORK?](#)
2. [WHAT IS PERSONAL INFORMATION AND WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?](#)
3. [HOW DO WE COLLECT YOUR PERSONAL INFORMATION?](#)
4. [WHAT ARE THE LAWFUL GROUNDS THAT WE RELY ON TO PROCESS YOUR SENSITIVE PERSONAL INFORMATION?](#)
5. [THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL INFORMATION](#)
6. [WHEN AND TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION](#)
7. [MARKETING](#)
8. [INTERNATIONAL DATA TRANSFERS](#)
9. [DATA RETENTION](#)
10. [WHAT ARE YOUR INDIVIDUAL RIGHTS?](#)
11. [SECURITY: HOW WE PROTECT & STORE PERSONAL INFORMATION](#)
12. [MINORS](#)
13. [CHANGES TO PAYU INNOVATIONS PRIVACY STATEMENT AND YOUR DUTY TO INFORM US OF CHANGES](#)
14. [HOW TO CONTACT US](#)

1. WHO IS PAYU INNOVATIONS AND HOW DOES THE PAYU INNOVATIONS PRIVACY STATEMENT WORK?

PayU India Innovations Private Limited ("**PayU Innovations**", "**we**", "**our**", "**us**") is a company incorporated in India having its registered office at 214, 1st Floor, DLF South Court, Plot No. A-1, Saket District Centre, Saket, New Delhi – 110017, Delhi and its corporate office at 9th Floor, Bestech Business Tower, Sector 48, Gurgaon, Haryana – 122003, with CIN no. U72900DL2022PTC397624. PayU Innovations is in the business of amongst others providing data analytics, data insights, digital marketing and related products and other value added services that may include provision of enabling services relating to credit and banking, to various merchants, marketplaces, banks, business units, technology service providers, aggregators, financial institutions and entities both in India and outside India, including any customers of any of the above. PayU Innovations is a wholly owned subsidiary of PayU Payments Private Limited ("**PayU Payments**") and belongs to the Prosus Group of companies i.e., Prosus N.V, a company registered with the Trade Registry for Amsterdam under registration number 34099856 (<https://www.prosus.com/companies>) and its affiliates.

The purpose of this privacy statement ("**PayU Innovations Privacy Statement**") is to give you information on how PayU Innovations collects, stores, uses, discloses, transfers and processes your Personal Information (defined below) including Sensitive Personal Information (defined below) when you use websites ("**Website(s)**"), software applications or mobile applications for availing services ("**Apps**"), any platforms, ("**Platforms**"), hosted by us or our Group Entities or business partners or through third parties, including the steps we take to protect your Personal Information (including Sensitive Personal Information).

This PayU Innovations Privacy Statement is applicable to the businesses, products or services of PayU Innovations.

By accessing the Websites, Apps, Platforms and/or using products or services provided by PayU Innovations, directly or indirectly, you agree that you have read and understood and agree to be bound by this PayU Innovations Privacy Statement. By using the Websites, Apps, Platforms and/or having used or using the products or services offered by PayU Innovations, directly or indirectly, in the past, present or future, you expressly agree to the use and disclosure of your Personal Information and Sensitive Personal Information submitted to us in accordance with this PayU Innovations Privacy Statement. You further acknowledge and accept that your agreement herein shall also be applicable to your Personal Information and Sensitive Personal Information submitted to us, directly or indirectly, in the past.

It is strongly recommended for you to return to this page periodically to review the most current version of this PayU Innovations Privacy Statement which is amended by us from time to time as these become applicable with effect from the date of publication.

2. WHAT IS PERSONAL INFORMATION AND WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

"Personal information": means any information that relates to an individual, which directly or indirectly, in combination with other information available or likely to be available with us, is capable of identifying such individual.

"Sensitive Personal Information": means any Personal Information of an individual, which consists of information relating to financial information such as bank account, credit card, debit card or other payment instrument details; passwords; biometric information; sexual orientation; physical, physiological and mental health condition; and medical records and history. Information freely available or accessible in public domain or procured from a source to whom the individual has already provided consent or permission for sharing is not treated as Sensitive Personal Information.

Depending on who you are (e.g., a merchant, customer, cardholder, consumer, supplier or business partner) and how you interact with us (e.g., telephone, IVR, API, online or offline), we may collect, use, receive, store, analyze, combine, transfer or otherwise process different categories of your Personal Information (including Sensitive Personal Information).

Below is a table of the categories of Personal Information and Sensitive Personal Information which we may collect about you:

Categories of Personal Information	Which includes information such as:
"Identity and Account Log- In Information"	Full name(s), title, age, user ID, gender and your date of birth.
"Contact Information"	Telephone/mobile number(s), permanent and current address(es), state/city of residence, country, pin code, email address(es), and chosen billing address(es).
"Financial Information"	Personal bank account data including credit or debit card information, including the credit or debit card number, card type, expiry date on the credit or debit card, and name on the card, UPI handle, netbanking details, details of payment wallet, KYC details, PAN card details, details of payment instrument used for prepaid mobile recharge and any other payment or financial instruments.
Group Entities	includes PayU Payments, PayU Finance India Private Limited (" PayU Finance "), Lazypay Private Limited (" Lazypay "), Paysense Services India Private limited (" Paysense "), enStage Software Private Limited (" Wibmo ") and such

	other entities under the Prosus group including entities created in future.
"Identification Information"	Identifiers such as cookie id, device id <i>etc.</i> or any other identifier from a third party.
"Usage and Technical Information"	IP addresses, application, device or browser type, versions and configurations, operating systems, device brand and model, time zone setting, geo-location information, content, unique identifiers associated with your device(s) and pages that you access on the Website(s), Apps or Platforms, and the dates and times that you visit the Websites, Apps or Platforms, and paths taken.
"Credit related Information"	Credit or affluence related information or assessment provided by third parties such as financial institutions or account aggregators or similar third parties as permitted under applicable laws of India including our business partners, independent service providers and our Group Entities.
"Marketing and Communications Information"	Communications with customer service support, behavioural data (for example, data collected using cookies), information about promotions, surveys, promotional campaigns and records of your decision(s) to subscribe or to withdraw from receiving marketing materials, if any.
Information in your device(s)	We may also access location data in your devices to enable you to access our services after seeking necessary permissions as permitted under applicable laws.

We may also collect, use, process and/or share non-Personal Information and/or anonymized and/or aggregated data such as statistical or demographic data in accordance with this PayU Innovations Privacy Statement.

As a matter of principle, we do not collect certain special categories of Personal Information about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health or any genetic and biometric information (except where such details were used by you for conducting any payment/ financial transactions and where you have provided

your consent for the same)). However, we may collect certain Sensitive Personal Information in order to provide our services or products to you, such as some categories of Financial Information, including bank account number, number on credit or debit cards, UPI handle, netbanking details, details of payment wallet, details of payment instrument used for prepaid mobile recharge and any other payment or financial instruments. In such cases, we ensure that such Sensitive Personal Information is collected, used, processed, stored and/or disclosed in accordance with this PayU Innovations Privacy Statement and in compliance with applicable laws of India.

To the extent the Websites, Apps or Platforms include link to third-party websites, plug-ins and applications (including third-party cookies, tracking technologies and widgets by third party and third-party advertisers), it is important that you understand that by accessing the Websites, clicking on those links or enabling those connections, you may allow third parties to collect, use, process, store or share data about you. **PayU Innovations does not have oversight of these third-party websites, plug-ins and applications and we are not responsible for their collection, processing, usage, storage or transfer of your Personal Information or Sensitive Personal Information. Any information collected by a third party in this manner is subject to that third party's own data collection, use, processing, storage and disclosure policies and you must make yourselves conversant with those.**

3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

How we collect Personal Information (including Sensitive Personal Information) will depend on the following broader situations:

3.1. If we receive or collect it directly from you

We may collect Personal Information (including Sensitive Personal Information) directly from you in different ways on the Websites, Apps, Platforms or product or service offerings. For example, you give us your Personal Information (including Sensitive Personal Information) when you:

- a. give us your Contact Information so that we can contact you about our services and products;
- b. conclude a contract or verify to us who you are (whether by email, phone or electronic verification);

- c. provide your Personal Information (including Sensitive Personal Information) on the Apps, Websites, Platforms or by connecting to us through other modes of communication, both online or offline;
- d. apply for our products or services directly with us or through our Group Entities and business partners (such as various marketplaces, payment aggregators, merchant websites, resellers or credit providers);
- e. directly register with us for availing any products or services;
- f. enter a competition, promotion or survey or you agree to receive marketing materials to be sent by us, our Group Entities or other business partners;
- g. provide your Personal Information (including Sensitive Personal Information) when you send us a support request including filing a complaint or for resolution of dispute with us;
- h. access, use and/or browse our Website(s), Apps or Platforms; or
- i. conclude a payment/financial transaction where PayU Innovations has a role to play as a service provider, technology provider, data partner or acts in any other similar capacity.

3.2. If we collect it from third parties, Group Entities or from publicly available sources

We obtain Personal Information (including Sensitive Personal Information) through third parties including our business partners, independent service providers and our Group Entities or from publicly available sources, as permitted under applicable laws of India, including:

- a. from our merchants, marketplaces, re-sellers, banks, payment partners, payment aggregators, payments systems, payment service providers and financial institutions.
- b. from social platforms and networks when you give us permission to do so either directly or through a cookie. For example, depending on your social media settings, if you choose or consent to connect your social media account to a PayU Innovations product or do not disable cookies while accessing the Website(s), Platform or an App, certain information from your social media account may be shared

- with us (which may include information that is part of your profile);
- c. from financial institutions and fraud prevention agencies for the purposes of conducting fraud and risk assessments or analysis;
- d. from third parties, such as merchants, e-commerce platforms, third party data intelligence platforms, or other business partners of PayU Innovations, who have either entered into a contract with you or have obtained your consent or you have given permission to us or to them to do so, either directly or through cookies on websites, platforms and/or checkout pages visited by you or through any other legal means as may be available in accordance with applicable laws of India. **We encourage you to read third parties' privacy statements every time you share your Personal Information with such entities;**
- e. from publicly available sources in accordance with applicable laws of India; and
- f. from third parties within the group of companies to which PayU Innovations belongs subject to applicable laws of India.

4. WHAT ARE THE LAWFUL GROUNDS THAT WE RELY ON TO PROCESS YOUR SENSITIVE PERSONAL INFORMATION?

For collecting, processing (including using and storing), disclosing or sharing your Sensitive Personal Information as described in this PayU Innovations Privacy Statement, subject to the provisions of applicable laws, we hereby through this PayU Innovations Privacy Statement, seek your consent and give you a notice regarding collecting, processing (including using and storing), and sharing your Sensitive Personal Information for one or more of the purposes detailed herein. For any purposes where, as per applicable laws of India, a specific consent is required, we will seek such specific consent from you from time to time.

You may, of course, choose to decline to share certain information with us, in which case we may not be able to provide to you some or all of the features and functionalities of the Websites, Apps and the Platforms. This may also affect our ability to process your Personal Information (including Sensitive Personal Information) and may therefore lead to the non-availability or discontinuation of the services for which such Personal Information (including

Sensitive Personal Information) are to be used or was being used, at our sole discretion.

5. THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL INFORMATION

We process your Personal Information (including Sensitive Personal Information) for the purposes mentioned below:

5.1. To verify, authenticate and authorize your use of our products or services

We process your Personal Information (including Sensitive Personal Information to the extent applicable) for creating login credentials or establishing a user account with us, and doing risk assessments in order to authenticate and authorize your use of our products or services depending on if you are a merchant, consumer or customer, and your choice of services or products. The type of Personal Information (including Sensitive Personal Information to the extent applicable) typically required is Identification Information, Identity and Account Log-In Information, Contact Information and Financial Information. This is necessary in order for PayU Innovations to assess your application and necessary for our legal obligations under certain applicable laws of India.

5.2. To provide products and services to you

We also process your Personal Information (including Sensitive Personal Information) in order to provide you products or services being offered or enabled by us, our Group Entities or our business partners, including third party data intelligence platforms. PayU Innovations offers multiple types data analytics and related products and other value-added services, which are subject to product specific service terms (contracts) and legal obligations.

5.3. To do risk assessments and analysis

We may process your Personal Information (including Sensitive Personal Information) for the purposes of risk assessments and evaluations, to improve our services, reduce fraud rates, build risk models, etc.

5.4. To generate variables, affluence and reliability scores

We process your Personal Information available with us or our Group Entities to generate or obtain variables, assign scores and use the same internally and also share it with other Group Entities and our business partners, including third party data intelligence platforms for the purpose of enabling such entities to market and provide their goods and services to you. Group Entities or other business partners, including third party data intelligence platforms may further provide PayU Innovations with analysis generated by them which PayU Innovations may combine with data available with it to synthesize its own analysis. PayU Innovations may also share such analysis with Group Entities or our business partners who may rely on the same to make various business decisions including decisions regarding whether to offer their products or services to you or the products and services of their customers. Such analysis as described above does not usually utilise any Sensitive Personal Information about you, however any utilization of Sensitive Personal Information will be in accordance with provisions of applicable laws.

5.5. To protect our business and to ensure compliance with the law

We process your Personal Information (including Sensitive Personal Information) to meet the requirements of applicable laws, regulations, standards, rules, and codes with which PayU Innovations must comply. This includes:

- a. authenticating and validating your user account;
- b. consulting and reporting your Personal Information (including Sensitive Personal Information to the extent applicable) and behaviour on monetary obligations to legitimately constituted financial, commercial or service risk centres, or to other financial institutions, under applicable laws of India or in furtherance to contracts;
- c. processing your information for the purpose of ensuring compliance under applicable laws and for resolving or contesting any claims made by or against you against PayU Innovations, our Group Entities, our business partners, including third party data intelligence platforms or any other third party; and
- d. processing (including storing or using) your Personal Information (including Sensitive Personal Information) to

ensure business continuity of our businesses and appropriate disaster recovery for the Websites, Apps, Platforms, services and products.

5.6. To manage our relationship with you

If you contact us or otherwise give us your Contact Information (for example by registering, by completing an enquiry form on the Website(s), Apps and/or Platforms, or by subscribing to receive support and service status communications from us regarding security or fraud monitoring alerts), we process your Personal Information (including Sensitive Personal Information):

- a. to inform you about our products or services and any changes to these products or services and any associated legal documents;
- b. to notify you if there is any interruption of services or products;
- c. to ask you to provide information on how we can improve or develop services or products and to otherwise effectively communicate with you;
- d. to provide you with service assistance and problem solutions or to contact or send you notifications related to the services or products we offer to you; and
- e. to use your Personal Information (including Sensitive Personal Information) in transactional or fraud monitoring reports (or both) as part of the performance of our contracts (to the extent applicable). You may have the option to unsubscribe from such reports in accordance with the terms of our contract.

5.7. To market our products and services including products and services of our Group Entities and business partners

We use your Personal Information to market, either ourselves or through our Group Entities, our business partners or any other third parties, our products and services including products and services of our business partners, including third party data intelligence platforms, independent service providers and /or our Group Entities and to notify you about

events, offers, sponsorships, marketing programmes and similar marketing campaigns.

We may also process and analyse your Personal Information (including Sensitive Personal Information) to understand your usage trends and preferences, and to develop and market (either ourselves or through our Group Entities, our business partners or any other third parties) new products, services, features and functions to you based on such analysis of your Personal Information (including Sensitive Personal Information).

5.8. To conduct research and to develop and improve our products and services

We use Personal Information (including Sensitive Personal Information) that we collect to conduct the following activities either ourselves or through our Group Entities, our business partners including data intelligence platforms or any other third parties:

- a. to research and gain insights into market trends and needs and to develop or innovate our technologies, products and services to meet such market trends and needs. We may use machine learning and artificial intelligence techniques to conduct research to gain such insights;
- b. to analyze visitor use of the Websites, Apps, Platform, products or services in accordance with this PayU Innovations Privacy Statement;
- c. to improve and personalize our merchant and customer relationships; and
- d. to provide our Group Entities, clients, our business partners or any other third party with statistical insights and reports based on your information we receive from them.

6. WHEN AND TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

6.1. Sharing with our affiliates and Group Entities

We may share your Personal Information (including Sensitive Personal Information) with our Group Entities and affiliates, being from the group

of companies to which PayU Innovations belongs, i.e., the Prosus Group <https://www.prosus.com/companies>. We may disclose your Personal Information (including Sensitive Personal Information) to those entities, to:

- a. provide support services, technology and technical services to these affiliates and Group Entities and to receive some of these services from them;
- b. contribute to the research, data analytics and studies in order to improve the products and services that PayU Innovations, our business partners, independent service providers and our Group Entities respectively provide;
- c. to offer their products and services to you or enable our Group Entities and affiliates to offer their products and services to you, including offering combined products and services; and
- d. provide data analytics and data insights related products, including but not limited to generation of variables and scores, for further processing or usage of the same for development and marketing the products and services that we, our business partners, independent service providers and our Group Entities respectively provide.

6.2. Sharing with business partners, including various data intelligence platforms

We may share your Personal Information (including Sensitive Personal Information) with our business partners such as:

- a. **merchants**, in accordance with our technology or service agreements (also at times referred to as our terms and conditions). For example, to enable the merchant extend its products and services to you, PayU Innovations will share your data with the merchant;
- b. **authorized financial institutions and banking partners**, with whom we partner to jointly create and offer products and services.; and

c. **other business partners including third party data intelligence platform and financial institutions**, for the purposes of enabling such entities to market and offer their products and services to you including credit products and services, or any other lucrative deals and premium products and services, and also for carrying out research and analytics. We may also share your Personal Information (including Sensitive Personal Information) with our business partners, independent service providers, our Group Entities (and their business partners) and financial institutions to assist them in understanding your interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions based on which such business partners, independent service providers, Group Entities and financial institutions may market and offer their products and services to you.

6.3. Sharing with service providers or vendors

We may share your Personal Information (including Sensitive Personal Information) with various service providers or vendors under contract who assist us with our business operations.

6.4. Sharing with companies that we plan to merge with or entities that we may acquire

We may share your information with the companies that we plan to merge with or the entities acquired by us. In such situation we will require that the new combined entity or the acquiring entity or the acquired entity follows this PayU Innovations Privacy Statement with respect to your Personal Information (including Sensitive Personal Information).

6.5. Sharing with regulatory and law enforcement agencies

We may share your Personal Information (including Sensitive Personal Information) with government officials, regulatory bodies, courts/tribunals, law enforcement agencies, fraud detection agencies or other such agencies or authorities when we are obligated to do so by law (such as via a subpoena, court order or similar legal procedure).

6.6. Sharing with international entities

We may share your Personal Information (including Sensitive Personal Information) with the international entities that we or our Group Entities partner with for the offer and/or development of products and services subject to the requirements under this PayU Innovations Privacy Statement and applicable laws.

PayU Innovations and our Group Entities ensure that every business partner or affiliate involved in the processing including using and storing of your Sensitive Personal Information has the required organizational and technical protections in place as required under applicable laws of India.

7. MARKETING

In relation to the products and services provided by us or our Group Entities including our or their business partners or affiliates with whom we share your Personal Information (including Sensitive Personal Information) as per this PayU Innovations Privacy Statement, you may receive marketing communications from PayU Innovations, our Group Entities or such other business partners or affiliates of us or our Group Entities, by messages, SMS, email, or through other digital modes, on the Platforms, Websites and Apps or other platforms including social media platforms, if we have received or you have provided us your Personal Information (including Sensitive Personal Information) as per this PayU Innovations Privacy Statement. We, our Group Entities, and such business partners or affiliates of PayU Innovations or our Group Entities may market their own products or services including third party products and services using such communications.

The provision of such marketing activities shall be in accordance with the applicable laws of India. For marketing activities done by us or our Group Entities, we and our Group Entities keep a record of marketing and communication information. You are entitled to opt out from receiving such marketing communications by either clicking on an opt-out link or unsubscribe the link, if any such link is provided, or write to us at privacy@payuinnovations.in.

PayU Innovations and our Group Entities may also use Marketing and Communications Information in order to improve and customize the content of any ads, promotions and advertising that may be of interest to you.

8. INTERNATIONAL DATA TRANSFERS

We are part of a global group with a global footprint. Your Personal Information (including Sensitive Personal Information) may be processed either locally in India, or in any other country where our or our Group Entities' approved service providers operate, worldwide, as permitted under applicable laws of India. Through this PayU Innovations Privacy Statement, we hereby seek your approval to transfer your Personal Information (including Sensitive Personal Information) to our and our Group Entities' approved service providers under contracts for the purposes defined under this PayU Innovations Privacy Statement or as may be communicated to you from time to time. Should your Personal Information (including Sensitive Personal Information) move outside India, we will ensure to comply with the provisions of applicable laws of India and also ensure that our and our Group Entities' service providers comply with the same level of data protection as are applicable in India pursuant to Indian laws.

9. DATA RETENTION

PayU Innovations may store your Personal Information (including Sensitive Personal Information) for as long as the same is required and is permissible as per the applicable laws in India for the fulfilment of purposes for which we collected it. The retention of Personal Information (including Sensitive Personal Information) by PayU Innovations is determined by considering compliance with legal (that is, contractual or statutory or regulatory requirements), accounting and compliance reporting requirements.

10. WHAT ARE YOUR INDIVIDUAL RIGHTS?

We ensure that you may exercise your individual privacy rights under applicable privacy and data protection laws and as per our policies and this PayU Innovations Privacy Statement. This means that PayU Innovations seeks to provide reasonable assistance in catering to requests from individuals regarding the processing including storing and using of their Personal Information and the right to amend their Personal Information and withdraw permission for using their Sensitive Personal Information. Subject to the requirements of applicable laws in India and as per our policies, you can exercise the following rights:

10.1. Right to review, correct or rectify Personal Information

You can ask us to get the inaccurate Personal Information (including Sensitive Personal Information) we process about you, to be fixed or changed and can also request to review your Personal Information (including Sensitive Personal Information) available with us.

10.2. Right to withdraw your consent

You may withdraw a consent to process (including usage) that you have given to us and prevent further processing or using of your Sensitive Personal Information. You may also withhold your consent prior to the collection, processing or using your Sensitive Personal Information.

Please submit a request to privacy@payuinnovations.in if you would like to exercise any of the above rights. These rights are limited in some situations, such as where we are legally required to retain your Personal Information (including Sensitive Personal Information). Please note that this may also affect our ability to process or enable your Personal Information (including Sensitive Personal Information) and may therefore lead to the discontinuation of those services or products for which this Personal Information (including Sensitive Personal Information) was being used, at our sole discretion.

11. SECURITY: HOW WE PROTECT & STORE PERSONAL INFORMATION

The security of your Personal Information (including Sensitive Personal Information) is important to us. We take necessary physical, technical, managerial, and operational measures that are designed to improve the integrity and security of information that we collect and maintain as required by applicable laws of India.

PayU Innovations also regularly reviews its policies regarding the collection, storage, using and processing of your Personal Information (including Sensitive Personal Information), including physical security measures, preventing alteration, loss, query, use or fraudulent or unauthorized access of your Personal Information (including Sensitive Personal Information).

PayU Innovations has put in place procedures to deal with information breach and will notify you and any applicable regulator or authority of a breach where we are legally required to do so.

12. MINORS

PayU Innovations does not voluntarily or actively collect, use or disclose Personal Information (including Sensitive Personal Information) of minors without the prior consent of the parents or guardians of the minor.

The services of PayU Innovations are not intended or designed to attract minors.

If we learn that we collected the Personal Information (including Sensitive Personal Information) of a minor without first receiving a verifiable parental consent, we will take steps to deal with the information in a manner consistent with applicable laws of India as soon as possible.

13. CHANGES TO THE PAYU INNOVATIONS PRIVACY STATEMENT AND YOUR DUTY TO INFORM US OF CHANGES

This PayU Innovations Privacy Statement may change or be amended over time. The recent version of this PayU Innovations Privacy Statement is published on the Websites, Apps and/or Platforms.

Please revisit this page periodically to stay aware of any changes to this PayU Innovations Privacy Statement as such changes are effective from the date of their publication. Your continued use of our services confirms your acceptance of this PayU Innovations Privacy Statement, as amended. If you do not agree to this PayU Innovations Privacy Statement, as amended, you must stop using our services and notify us.

It is very important that any Personal Information (including Sensitive Personal Information) we hold about you is up to date and correct. Please inform us of any changes to your Personal Information (including Sensitive Personal Information) at the earliest.

14. HOW TO CONTACT US

The controller of this Website, App and/or Platform (as applicable) is PayU Innovations Private Limited having its registered office at 214, 1st Floor, DLF South Court, Plot No. A-1, Saket District Centre, Saket, New Delhi – 110017, Delhi and having CIN no. U72900DL2022PTC397624. We are happy to address any of your queries, concerns or questions relating to processing (including storing and using), of your information which you can raise by writing to us at [**privacy@payuinnovations.in**](mailto:privacy@payuinnovations.in).

You may address any complaints or discrepancies in relation to the processing (including storing and using) of your Personal Information (including Sensitive Personal Information) to:

Mr. Neeraj Chauhan

Grievance Officer
PayU India Innovations Private Limited
214, 1st Floor, DLF South Court,
Plot No. A-1, Saket District Centre,
Saket, New Delhi – 110017, Delhi, India.