

### **Privacy Policy for tokkei.club**

Effective Date: September 01, 2025

This Privacy Policy describes how Machpay Fintech LLP, a company based in Chennai, India ("we," "us," or "our"), collects, uses, discloses, and protects your personal information when you visit or use our website tokkei.club (the "Website"), which provides payment solutions. We are committed to protecting your privacy in accordance with the Digital Personal Data Protection Act, 2023 (DPDPA), the Information Technology Act, 2000, and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

By using the Website, you consent to the practices described in this Privacy Policy. If you do not agree, please do not use the Website.

We have appointed a Grievance Officer to address any concerns regarding your personal data. Contact details: grievance@tokkei.club. Grievances will be addressed within one month.

#### **Website Visitors**

When you visit our Website, we may automatically collect certain non-personally identifiable information about your device and usage, such as your IP address, browser type, operating system, referring URLs, pages viewed, time spent on pages, and clickstream data. This information is collected through server logs and helps us analyze trends, administer the Website, track user movements, and improve user experience.

We do not link this automatically collected data to personally identifiable information unless required for security or fraud prevention purposes. This collection is necessary for the legitimate operation of our payment solutions and complies with DPDPA's provisions for lawful processing.

#### **Payments**

As a payment solution provider, we facilitate online payments for goods and services. When you make or receive payments through our Website, we collect payment-related information, including but not limited to:

- Billing and shipping addresses
- Payment method details (e.g., credit/debit card numbers, expiration dates, CVV, UPI IDs, bank account details)
- Transaction amounts and details



This information is encrypted and processed in compliance with Payment Card Industry Data Security Standards (PCI DSS) and Reserve Bank of India (RBI) guidelines. We do not store full card details on our servers; instead, they are tokenized and handled by certified third-party payment gateways.

We use this data solely for processing transactions, preventing fraud, and fulfilling legal obligations (e.g., tax reporting). Your consent is obtained at the time of payment, and you can withdraw it, though this may prevent transaction completion.

# **Gathering of Personally-Identifying Information**

We collect personally-identifying information (PII) when you voluntarily provide it, such as during account registration, payment processing, or contacting support. This may include:

- Name
- Email address
- Phone number
- Date of birth
- Address
- Government-issued ID (for KYC verification, as required by RBI)
- Financial information (e.g., bank details for payouts)

Sensitive personal data, such as financial details or biometric information (if applicable), is collected only with your explicit consent and for specified purposes like identity verification or transaction processing. We limit collection to what is necessary and inform you of the purpose at the time of collection, as required under DPDPA.

#### **Aggregated Statistics**

We may collect and analyze aggregated, anonymized data from Website usage and transactions to generate statistics. This includes metrics like total transactions processed, user demographics (without identifying individuals), and Website traffic patterns.

These statistics help us improve our services, conduct market research, and report to partners or regulators. No individual PII is disclosed in aggregated form, ensuring compliance with data minimization principles under DPDPA.



## Protection of Certain Personally-Identifying Information

We implement reasonable security practices to protect your PII from unauthorized access, alteration, disclosure, or destruction. Measures include:

- Encryption of data in transit (using SSL/TLS) and at rest
- Access controls and firewalls
- Regular security audits and vulnerability assessments
- Compliance with ISO 27001 standards (or equivalent)

In the event of a data breach, we will notify affected users and the Data Protection Board as required by DPDPA. We share PII only with trusted third parties (e.g., payment processors, KYC vendors) under strict contracts, and only for the purposes disclosed to you. We do not sell or rent your PII.

#### **Account Deletion**

You have the right to request deletion of your account and associated PII at any time, subject to legal retention requirements (e.g., for audit or tax purposes under RBI guidelines). To request deletion:

- 1. Log in to your account and navigate to the settings section.
- 2. Select "Delete Account" and confirm.
- 3. Alternatively, email our Grievance Officer with your request.

Upon verification, we will erase your data within a reasonable time (typically 30 days) and confirm the deletion. Note that some anonymized data may be retained for statistical purposes.

#### **On Demand Data Retrieval**

Under DPDPA, you have the right to access, correct, update, or obtain a summary of your personal data processed by us. To exercise this right:

- 1. Submit a request via email to our Grievance Officer, including proof of identity.
- 2. We will provide the information free of charge within 30 days, unless the request is voluminous or repetitive.

This includes details on data shared with third parties and the purposes of processing. You may also nominate another individual to exercise these rights on your behalf in case of incapacity.

#### **Cookies**



We use cookies and similar technologies (e.g., web beacons, pixels) to enhance your experience, remember preferences, and analyze usage. Types include:

- Essential cookies: For core functionality, like session management.
- Analytics cookies: To track Website performance (e.g., via Google Analytics).
- Marketing cookies: For personalized ads (with your consent).

You can manage cookies through your browser settings or our cookie consent banner. By continuing to use the Website, you consent to essential cookies. For non-essential cookies, we obtain explicit consent as per DPDPA. For more details, see our Cookie Policy [link if separate].

#### **Prohibited and Restricted Content**

While this is primarily a Privacy Policy, we prohibit users from uploading, transmitting, or processing any content that:

- Violates Indian laws (e.g., obscene, defamatory, or infringing material under the IT Act).
- Involves illegal activities, such as money laundering or terrorist financing.
- Contains malware, viruses, or harmful code.

We may monitor transactions for compliance and report suspicious activities to authorities. Violation may lead to account suspension. For full details, refer to our Terms and Conditions.

### **Privacy Policy Changes**

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. Changes will be posted on the Website with the updated effective date. We will notify you of material changes via email or prominent notice on the Website. Continued use after changes constitutes acceptance.

#### **Other Terms and Conditions**

This Privacy Policy should be read in conjunction with our Terms and Conditions [link], which govern your overall use of the Website. In case of conflict, the Terms and Conditions prevail unless otherwise stated.

If you have questions about this Privacy Policy, contact our Grievance Officer at the details provided above.