

DATA PRIVACY POLICY

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Findoc Finvest Private
Limited**

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Preamble

This Data Privacy Policy sets forth the reasonable security practices and procedures adopted by the Company and shall apply to use and disclosure and sharing of Customer's Data on the website/ web application, mobile application or otherwise and in scope includes Cloud IT environment as well ("**Company's information resources**"). This privacy policy shall be read in conjunction with the terms of use agreed by the Customer while registering with Company for availing its Services.

Important Definitions

Customer shall mean any individual who has logged on to Company's Mobile App or Web based application or any other Company's information resource or is a registered user or a borrower of the Company.

Data for the purpose of this Policy (except where specifically defined otherwise) shall mean and include all information and details supplied by the Customer or accessed by the Company or Third Party as per the Consent provided including sensitive personal data/ information that identifies individuals, such as individual's Name, Address, Date of birth, Bank Account details, Phone number, Fax number or Email address.

Services means any of the service(s) that are provided by Company to its Customers and/or users by way of any Company information resources including lending services.

Third Party shall mean and include Company's group entity(ies), third party vendors (of any nature whatsoever) and/or consultants, advisors, partners, banks, financial institutions, credit bureau/ agencies, identity authenticating agencies (NSDL, UIDAI, State Transport Department, etc., regulatory or statutory bodies

(A) Consent

Company shall obtain a Customer's consent in writing or electronically accessed by Company or Third Party as per the Consent provided by the Customer to Access the Data with an audit trail of the purpose/ usage to provide Services under the terms of use. This personal Data collected from Customers is solely for the Purposes provided under this Policy and the Consent provided by the Customer. Access, storage and usage of Data by the Company shall be as permitted/ allowed under extant statutory and regulatory guidelines. For the purpose of this Policy, '**Access**' shall mean and include access, collection, storage, sharing, monitoring.

Data shall be collected on need basis and as provided will be on '*as on basis*'. Company shall not be responsible for unverified personal information or Data supplied by Customers.

Additionally, in case of Digital Lending (as defined under RBI Digital Lending Guidelines, September 2, 2022), Company shall desist from accessing mobile phone resources like file and media, contact list, call logs, telephony functions, etc, except if needed for the purpose of providing Services to Customers or when an express Consent is provided by the Customer. Further, to onboard the Customer through the use of mobile or web application and KYC regulatory requirements, mobile resource access for camera, microphone, location or any other facility necessary, shall be requested from the Customer. Customers have the option to not agree to the collection of Data. Customers can also at any time withdraw the consent and delete/ forget data by uninstallation of the application from the device of the Customer.

(B) Purpose and Usage of Data:

Company requires Customer's Data to operate and provide various Services. Company may Access, share, transfer or use the Data only for the purpose as follows:

1. To fulfill the Customer requests for products and services offered and subscribed and accepted by Customer
2. To deliver to Customer any administrative notices, alerts, advice and communications relevant to Customer's use of the Service
3. Share Customer's Data with any Third Parties in so far as required for purpose of providing additional Services and / or to similar Services to provide Customer with various value-added Services
4. For market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity
5. To Third-Party contractors that provide services to Company are bound by similar privacy restrictions
6. Verifying Customer identity and address details and find nearest branches
7. Enabling secure downloads and uploads of documents related to loan, KYC, otherwise
8. Managing phone calls and SMS/texts, Sending reminders, etc.
9. Analyzing Customer's financial position/credit risk assessment/ credit appraisal
10. "Know Your Customer" (KYC) requirements like verification or authentication (any nature);
11. Data enrichment; Making personalized offers of products and services, credit rating, promotion or marketing of Company's product or its group companies or Third Party.
12. For the purposes connected with Company's 'Terms of Use' on any of the Company information resource
13. To undertake activities as may be permitted under law/regulations/directions/guidelines or by any authority or under any license or registration of the Company.
14. The Data so collected shall be used only for the purpose otherwise as may be expressly consented to by the Customer.
15. All such Data collected shall be retained so long as Customers are having account with Company and remain active to avail various services and/or as may be required under the law or by any authority. In case of deactivation / termination of the account / services with us, the Data provided will no longer be used unless consented for.

(C) Update of Data:

Company encourages the Customers to update this information as and when there are any changes. The Customer is also entitled to review the information provided and ensure that any Data/ personal information found to be inaccurate or deficient be corrected or amended as feasible. However, Company shall not be responsible for unverified, inaccurate or un-updated Data supplied or Accessed from the Customers.

(D) Sharing/Transfer/Disclosure of Data:

Data of the Customers will not be sold or otherwise transferred to unaffiliated third parties except if otherwise stated at the time of collection/Access or under Consent obtained from the Customer or as required under law. However, Company can share, exchange and disclose Data of the Customer to Third Parties with prior consent of the Customer or as may be permitted under applicable laws.

Company treats Customer's Data as private and confidential and does not check, edit, or reveal it to any third parties except as provided under this Policy or where it is expressly agreed and where it believes in good faith, such action is necessary to comply with the applicable legal and regulatory processes or to enforce the terms of service. Company may disclose personal information where it is under legal obligation to do so or where it is mandated under law or directed by any authority. Subject to the provisions of this Policy, Company may transfer Data to another Indian or overseas body corporate that ensures the same level of data protection that is adhered to by the Company, if it is necessary for the performance of a lawful contract between Company or any person on Customer's behalf or where Customer have consented to the data transfer.

Lending Service Providers (as defined under law) or Third Parties are also bound by a contractual obligation to ensure confidentiality of shared data and to comply with various technology standards/ requirements on cybersecurity stipulated by RBI and other authorities, as may be specified from time to time.

Details of Lending Service Providers (where and as applicable) allowed to collect Data through the web-based or mobile application are available on the website of the Company.

(E) Unsolicited Information:

Except where specifically agreed or necessary for operational or regulatory reasons, Company will not send the Customer any unsolicited information. However, to help the Customer to take full advantage of the service offerings of the Company the Customer will have the opportunity to indicate whether the individual would like to "opt out" of receiving promotional and/or marketing information about other products, services and offerings from Company and/or any Third Parties etc. If the Customer does not opt out, Company may use any email addresses of Customer to send occasional emails pertaining to the said information. The Customer can nevertheless unsubscribe from receipt of such emails by following instructions therein or by communicating accordingly to Company.

(F) Storage and Retention of Data:

Company shall retain Data of Customer as may be required to carry out their operations under applicable laws/ regulations/licenses or under the Consent provided by the Customer. The Data will be stored only in servers located within India and shall be retained for a period of 10 years from the date it is Accessed or obtained by the Company or so long as Customers are having account with the Company and remain active to avail various services, whichever is later. Subject to as provided in this provision/ clause and only if required under any of the applicable laws, Company will purge the Data on the Customer exercising its right to delete/forget the Data or at the end of the tenure of the loan/contract, whichever is later.

(G) Disposal, Destruction and Redaction of Data

Company Data Retention and Disposal requires managerial approval for the disposal, destruction and deletion of any Data. Our disposal, destruction and redaction procedures prevent the recovery, theft, misuse or unauthorized access of Data. The same is governed under existing organization's policies/ procedures.

(H) Use of Cookies:

Company's websites may use "cookies" (information stored on an individual's computer by an individual's

browser at our request). "Cookies" is a term generally used for small text files a web site can use to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behavior and compile aggregate data that will allow content improvements and targeted advertising etc. Cookies themselves do not personally identify individuals but they do identify individual's computers or devices. Generally, cookies work by assigning a unique number to the user computer/device that has no meaning outside the assigning site. Users are also being made aware that Company cannot control the use of cookies or the resulting information by advertisers or third parties hosting data on the Company website. If a user does not want information collected through the use of cookies, there is a simple procedure in most browsers that allows the user to deny or accept the cookie feature.

(I) Security of Data

Company is ISO27001:2013 certified and deals with mostly personal identifiable information (PII) of users, it becomes imperative to protect such information as soon as they are in the Company network. The ownership of the data lies with the skilled IT Function Team. Below are the security measures taken to prevent misuse of this type of information.

- (1) Company has implemented physical, administrative and technical security measures across the organization which are designed to prevent data loss, unauthorized Access to Data and misuse, disclosure, alteration, damage or destruction of Data.
- (2) Sensitive PII data are encrypted at rest using strong encryption algorithms. The keys used for such encryption algorithms are stored securely and access to keys are restricted to authorized entities only.
- (3) Company fully understands that the Data collected from individuals is under our guardianship. Therefore, Company trains its employees on the privacy policy as well as information security procedures regarding the appropriate access, use, and disclosure of Data.
- (4) Company also conducts periodic risk assessments on the processes and information systems and audits of material third-party vendors dealing with Data of the customer/user.
- (5) Company also conducts third party audit & assessment on periodic intervals for material vendors
- (6) Company has in place an incident response plan with trained personnel to respond to, investigate and mitigate the impact of any incident.
- (7) Company also maintains adequate plans for business continuity management, as well as disaster recovery processes for testing databases, servers, information systems and processes that handle personal data.

This Data Privacy policy shall be read in conjunction with Company Information Security and Information technology policies and procedures, as may be existing and applicable.

(J) Quality

Company informs individuals/users that it is the responsibility of the individuals/ users to provide accurate, complete and relevant information in order to maintain the quality and integrity of the Data available with Company. Individuals/Customer may contact Company designated personnel and have the personal information/Data amended or deleted, as required to ensure accuracy.

(K) Compliance and Reporting

The company is committed to comply with this Policy and with applicable privacy laws, regulations and applicable guidelines from authorities. Company conducts regular audits of our compliance with applicable privacy policies, procedures, laws, regulations, contracts and standards under applicable regulations.

(L) Change in Privacy Policy

Company reserves the right to change Privacy Policy at any time. Users/customers may note that this Policy itself and any such change of Policy will be effective from the date of posting on <https://findocinvest.com> shall be considered disclosed to the users/customers.

(M) Grievances:

For any grievances redressal, users/customers may note the redressal process under provided the Grievance Redressal policy available <https://findocinvest.com>

(N) Review / Revision of Policy

If at any point a conflict of interpretation / information between the Policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities (“Regulatory Provisions”) arises, then interpretation of the Regulatory Provisions shall prevail. In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the Policy shall stand amended accordingly from the effective date specified as per the Regulatory Provision



FINDOC FINVEST PVT. LTD.

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