

## **Privacy and Security Policy** (last updated on 21/04/2024)

### **Introduction**

This privacy and security policy (“**Privacy Policy**”) establishes the terms and conditions under which CreditMitra (“**the Company**” or “CreditMitra” or “**we**” or “**us**” or “**our**”) with registered address at [Hitech City, Hyderabad], processes the personal information that you provide us with when using the website “CreditMitra.in” (“**the Website**” or “**site**”), the mobile application or app “CreditMitra”, understood as the software application designed to be used on smartphones, tablets or other mobile devices (“**App**”) or other applications, software, digital media, storage medium, or functionalities related to our brand (collectively referred to as “**Platform**”).

CreditMitra has developed the Platform through which you may apply for a loan to be granted by various non-banking financial companies or banks (“**Lender**” or “**Lending Partner**”), based on the loan agreement to be executed between you and the Lender. The Lender has further appointed and authorized us to collect, store, authenticate, verify and share the Personal Information (*as defined below*) as may be required by the Lender to sanction and disburse the loan.

### **Our Commitment**

Maintaining your right to privacy and the security of your data is a priority at CreditMitra. We are committed to respecting your privacy rights. We pledge to handle your data in a fair and lawful manner at all times. We are also dedicated to being transparent about what data we collect about you and how we use it. By visiting and accessing the Platform and availing the loan facilitation services provided by us, you are deemed to have read, acknowledged and accepted all the provisions stated here in the Privacy Policy, including any changes we may make from time to time.

Our commitment to privacy and data protection is demonstrated through the preparation of this Privacy Policy, which aligns with the legal frameworks and guidelines of the Information Technology Act, 2000 (IT Act), Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 and Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, Reserve Bank of India Guidelines on Digital Lending and all other relevant acts, regulations and rules that mandate the publication of a privacy policy for handling and processing of personal information, including sensitive personal data or information.

This Privacy Policy provides you with the details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. By sharing any information on the Platform, you expressly signify that you have read, understood and agree to be bound by this Privacy Policy. If you do not agree to the terms of this Privacy Policy (in whole or part), kindly do not use/ access/ install the Platform (or any part thereof); or share any information on the Platform. By accessing the Platform/sharing any information on the Platform, you provide your express agreement and informed consent to all the terms and conditions as stated under this Privacy Policy and as may be amended from time to time. The **Terms and Conditions** of our services have been provided separately on the Platform and shall be read with this Privacy Policy as they are an integral part of our services.

### **Definitions**

**“Personal Information”** means 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. Such Personal Information may include your name, email address, date of birth, residence address, telephone number, credit or debit card number, your financial information, password, device information, identity information, login-in credentials of Third Party platforms, location information, and/or log information.

Provided that, any information that is freely available or accessible in public domain or furnished under any law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this Privacy Policy.

**“Third Party”** refers to an entity that is not the Company or its direct customer.

This Privacy Policy provides you with information about:

## **1. What Personal Information We Collect**

We will only collect information that is necessary and needed for the specified, explicit and lawful purposes of rendering our services and will not further process it in a manner that is incompatible with those purposes. We may collect the following types of information:

1. For the purpose of providing services to you, we require you to register yourself on our Platform. If you choose to access/register yourself on our Platform you are required to share your information with us or upload on our Platform including your contact information (e.g.: name, date of birth, gender, photo, postal or e-mail address, fax number, phone number, education, occupation, account details, identification documents, banking information such as salary slips, bank statements, PAN card, bank account number, payment information, or any other information/documents for KYC compliance). This information is also necessary to communicate with you for the loan application process.
2. Information specific to you that may be assigned by us. We may collect and use information such as your account ID (which you create while registering yourself on our Platform).
3. Location: We collect and monitor the information about the location of your device to check the serviceability of your loan application, prevent fraudulent activity and also provide customised loan offers.
4. Storage: We require storage permission so that you can easily upload the right KYC-related documents for a quick submission of loan applications. This will help us enhance your experience on our Platform.
5. Social media: We collect your public profile data depending on the social media or networking platform used like Facebook/LinkedIn etc. to login to our Platform. The information collected from your social media networking account shall be clearly displayed to you at the time of login to our Platform.
6. Device information: We collect unique device identifiers like serial numbers to uniquely identify the device to ensure that unauthorized devices are not able to act on your behalf and to mitigate fraud.
7. Credit information: We may collect information related to your social activities such as your credit-related information (e.g.: credit score) from Third Parties (under lawful contracts).
8. Financial information: We may collect information related to your transactions on the Platform such as loan details, transaction history, and repayment details.
9. Feedback Information: We also collect your other details including but not limited to your feedback, suggestions, views, opinions, etc. shared on our Platform that may be shared/volunteered by you on our discussion forums or other sites. Such information being in the public domain is available for access to all our Website users and visitors. You are advised to exercise discretion before you make such details public, as such information is vulnerable to misuse and can be easily misused. We fully disclaim any liability(ies) or claim(s), which may arise by use/misuse of such information shared by you, by any third party or any party not known to us.
10. Log information: We may collect information related to your use of certain functions. For example, cookies and other anonymous identifier technologies, IP addresses, network request information, temporary message history, standard system logs, and crash information.
11. Usage Information: We use tracking tools like Google Analytics, Google Webmaster, browser cookies etc. for collecting information about your usage of our Website.

This list is not exhaustive and, in specific instances we may need to collect additional data for the purposes set out in this Privacy Policy. However, one time access may be required for camera, microphone, location or any other facility necessary for the purpose of on-boarding/ fulfilling KYC requirements. Further, any information exchanged by you with us in the form of written communication, responses to emails, feedback required from you, participation in discussions, etc. is handled with confidentiality.

We may collect other types of Personal Information in exceptional circumstances only. If we do need to process additional types of Personal Information about you, we will make sure that you are informed about the processing of your Personal Information and that there is a valid legal basis for doing so (e.g. your consent).

## **2. Exception to Our Collection of Your Personal Information**

- 2.1.** We do not collect certain categories of Personal Information, such as your details relating to your race or ethnicity, religious or philosophical beliefs, biometric information, sexual orientation, political opinions, or information about your physical, physiological, or mental health condition, medical records and history or any genetic information.
- 2.2.** Children's Privacy: Our service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from children under the age of 13 years. If you are a parent or guardian and you are aware that your child has or children have provided us with Personal Information, please contact us at support@creditmitra.in. If we become aware that we have collected Personal Information from children under age 13 without verification of parental consent, we take immediate steps to remove such Personal Information from our Platform.

## **3. Personal Information You Provide Us**

- 3.1.** Please bear in mind that before availing any services on the Platform, you must read this Privacy Policy. You may choose not to provide certain Personal Information or withdraw the consent or ask us to delete such information collected or restrict disclosure to Third Parties subsequently with respect to such Personal Information by sending a written intimation. However, not providing certain compulsory information or withdrawing the consent may mean that it will not be possible to manage your registration as a user or to use certain functionalities available through the Platform.
- 3.2.** You hereby guarantee that the Personal Information provided is true and exact, and agree to report any change or modification thereto. If you provide us with the Personal Information of Third Parties, you shall be responsible for having informed them and obtained their consent for these details to be provided for the purposes indicated in the corresponding provisions of this Privacy Policy. Any loss or damage caused to the Platform, to the Company or to any Third Party through the communication of erroneous, inaccurate or incomplete information on the registration forms shall be your sole responsibility.
- 3.3.** The Personal Information provided by you will be collected and retained, on behalf of our Lending Partner. You hereby consent that we may process and disclose Personal Information to our Lending Partners, our affiliates, Third-Party service providers and credit bureaus for the purposes stated in this Privacy Policy and as maybe communicated to you.

## **4. Purpose and Processing of Your Personal Information**

S. No.	Purpose	Method of Use
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1.	Loan facilities	Providing loan facilitation services to you and to fulfill the legal compliance on our part as per applicable laws. This data is used to create your profile, complete necessary KYC procedures required by our lending partners, facilitate loan approvals, and provide personalized support when needed. Please note that we only store basic information such as name, address, and contact details.
2.	Improved services	Providing, processing, maintaining, improving and developing the Platform and our services for you, including customer support functions. Analyzing statistical information about the use of the Platform to improve our services.
3.	Updates	Contacting you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as the App's push notifications etc., regarding updates or informative communications related to the functionalities, contracted services, including Platform security updates, when necessary or reasonable for their implementation.
4.	Collection of metadata of installed applications	We shall access your list of the installed applications' metadata information to better understand your credit worthiness.
5.	Collection of calendar events	To better understand your credit profile, we will request your permission to access your calendar events.
6.	Storage	Storing and maintaining information about you for complying with our legal obligations.
7.	Marketing	Conducting marketing related activities, such as providing marketing and promotional materials.
8.	Setting up your account on the Platform	Personal Information, collected when creating a Platform account on our Platform or through your device, is used for creating the personal Platform account of the user.
9.	Identifying devices	Device related information and application related information may be used to identify devices when you use the Platform.
10.	Verifying user identity	The Platform uses your Personal Information to verify the user identity including your mobile number and/ or email address, (if any), through one time password (“ <b>OTP</b> ”) and to ensure that there is no log-in by any unauthorized persons.

11.	Managing risks and conducting anti-fraud checks	Device related information as well as your location and user information may be used to control risk, detect fraud and provide better services to you.
12.	Diagnosing service failures	Log information may be used to help diagnose service or technical problems and maintain security.
13.	Sending notices	From time to time, we may use your Personal Information to send important notices, such as communications about changes to our terms, conditions and policies.
14.	Collecting user feedback	The feedback you choose to provide is valuable in helping the Platform make improvements to our Services. In order to follow up on the feedback that you choose to provide, the Platform may correspond with you using the Personal Information that you have provided and may keep records of the same.

## 5. We may disclose your Personal Information

S. No.	Shared With	Reasons of Sharing
	Affiliated Companies	<p>a. Product research and development and enhance our products and services, making them more relevant and beneficial to you.</p> <p>b. To promote and advertise relevant products.</p> <p>c. Infrastructure and delivery system improvements</p> <p>If our affiliates intend to use your data for purposes not outlined in this Privacy Policy, they will provide you with appropriate notice and seek your explicit consent before using your data for such purposes.</p>
	Lender	<p>We contract with Lender to facilitate the provisioning of loan services offered by such Lender to you on the Platform. We will only disclose such information to the Lender that is necessary for you to use the Platform and transact with the Lender and to the extent the Lender requires such information to assess your suitability for a loan, grant a loan to you, or otherwise transact with you.</p>

	Third Party Service Providers	Third Party Service Providers who provide services to CreditMitra such as website hosting, data analysis, payment processing, infrastructure provision, information technology services, due-diligence, customer service, e-mail delivery services, credit card processing, auditing, training, and other similar services. (These third parties will be supplied with, or have access to, your Personal Information for the purpose of providing these services to us or on our behalf and are bound in the same capacity to protect your data as we are).
	Administrators	We might provide your Personal Information to our management team or administration department to enhance your experience with us and assist you 24*7.
	Third Party	In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
	Legislative & Credit Information Bureaus	<ul style="list-style-type: none"> <li>a. under applicable law, including laws outside your country of residence;</li> <li>b. to comply with legal process;</li> <li>c. to respond to requests from public and government authorities including public and government authorities outside your country of residence;</li> <li>d. to enforce <b>Terms and Conditions</b> of the Platform;</li> <li>e. to credit information companies</li> <li>f. to protect our operations or those of any of our affiliates;</li> <li>g. to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and</li> <li>h. to allow us to pursue available remedies or limit the damages that we may sustain.</li> </ul>

The above entities will be required to agree to use the information obtained from the Company only for specific assigned purposes and will be disposing the information in a secured manner consistent with the Company's policies.

## 6. How We Protect Your Personal Information

- 6.1. We are committed to protecting the privacy and the confidentiality of the Personal Information you share with us. We implement appropriate security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal information. This includes physical, electronic, and managerial procedures to safeguard and secure the information we collect.
- 6.2. All your Personal Information is stored on secure servers that are protected in controlled facilities situated in India. We shall only store basic personal information such as name, address, contact information etc. which are required to be stored for carrying out our services. For other personal information collected as part of our services being provided to the Lending Partners, we shall collect such information upon the instructions of the Lending Partners and thereafter transfer the same to the Lending Partners upon the completion of the preliminary onboarding.
- 6.3. We classify your data based on importance and sensitivity, and ensure that your Personal Information has the highest security level. We maintain appropriate technical and organizational security safeguards designed to protect the Personal Information we process against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use including adopting reasonable security practices and procedures comprising of managerial, technical, operational and physical security control measures as mandated under applicable Indian laws for the protection of Personal Information and to prevent unauthorised use or disclosure of Personal Information.
- 6.4. When you send or receive data from your device to our servers, we make sure they are encrypted using Secure Sockets Layer (“SSL”) and other algorithms.
- 6.5. We will take all practicable steps to safeguard your Personal Information. However, you should be aware that the use of the Internet is not entirely secure, and for this reason, we cannot guarantee the security or integrity of any Personal Information which is transferred from you or to you via the Internet.
- 6.6. We do not sell, trade, or rent users' personal information to Third Parties. However, we may share necessary information with trusted third parties who assist us in providing our services, subject to strict confidentiality obligations.

## **7. How Long We Retain Personal Information**

- 7.1. We retain the Personal Information for as long as it is necessary to fulfil the purpose for which it was collected as also outlined in this Privacy Policy, or as required or permitted by applicable law. Such information is retained for such period as necessary for legal, regulatory or accounting requirements.
- 7.2. We shall cease to retain Personal Information or remove the means by which the Personal Information can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that Personal Information was collected is no longer being served by retention of the Personal Information, and there being no outstanding payment obligations of you towards the Lender.
- 7.3. In accordance with the applicable KYC norms in India, the data relating to KYC is required to be retained for a stipulated time period (*five (5) years, as of February 2024*). Accordingly, we will be retaining all documents and information relating to your KYC.

## **8. Your Rights**



- 8.1. Your rights under applicable law may include access to the Personal Information we process about you, the right to have such Personal Information corrected/modified, updated or erased, the right to restrict the processing of your Personal Information, as well as the right to data portability.
- 8.2. Where we have obtained your consent for the processing of your Personal Information, you have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that has happened based on your consent prior to the withdrawal.
- 8.3. You have the right to give or deny consent for specific data usage, restrict disclosure to third parties, determine data retention periods, and revoke previously granted consent.
- 8.4. You also have the right to object, at any time, to the processing of your Personal Information which is based on the Company's legitimate interests. Further, if you wish to remove all your Personal Information from the Platform, you can do so by opting out of the Platform and uninstalling the Platform from your system(s).
- 8.5. To exercise these rights, you should make a written request using our contact details set out below and it may result in suspension or termination of our services being provided to you.

## **9. Governing Statute**

- 9.1. This Privacy Policy is governed by and is compliant with the applicable laws Republic of India, in order to protect Personal Information of the end-user(s) of the services.

## **10. Cookies**

- 10.1. Our Platform uses cookies. A cookie is a small text file, which is stored on your computer, mobile phone, tablet etc. in order to recognize your computer at recurring visits. The cookie may transmit information via your browser with the purpose of authenticating or identifying the computer (via e.g. the IP address) or the user. Cookies may contain information such as registration data and user preferences. When a server receives a request from a computer which stores a cookie from the website, the server is able to use the information stored in the cookie in combination with the information stored on the server.

## **11. Updates to the Privacy Policy**

- 11.1. We keep our Privacy Policy under regular review and may update this Privacy Policy to reflect changes to our information practices.
- 11.2. We reserve the right to update and amend this Privacy Policy at any time. Any changes made will be effective immediately upon posting the revised policy on our Platform. It is your responsibility to review this policy periodically and remain informed about any updates. Your continued use of services on the Platform will be taken as acceptance of the updated Privacy Policy. You acknowledge that no knowledge of the revised Privacy Policy shall not be a defence in any proceedings with regard to the Privacy Policy.

## **12. Terms and Conditions of Platform**

- 12.1.** If you choose to avail services at our Platform, your transaction and any dispute over privacy is subject to this Privacy Policy and our Terms and Conditions of Platform, including limitations on damages, resolution of disputes, and application of the prevailing law in India. If you have any concern about privacy at CreditMitra please contact us with a thorough description, and we will try to resolve it. If you are found to be in non-compliance with laws and regulations, the Terms and Conditions published on the Platform, or this Privacy Policy, CreditMitra shall have the right to immediately block your access and usage of the Platform and CreditMitra shall have the right to remove any non-compliant content and/or information forthwith, uploaded by you and shall further have the right to take appropriate recourse to such remedies as would be available to it under various statutes.

**13. Grievance Officer**

- 13.1.** If you have any comments, inquiries or concerns/complaints about this Privacy Policy or Terms and Conditions or other policies, or to exercise your rights, you may contact our Grievance Officer, Murthy Balaji at [grievance@creditmitra.in](mailto:grievance@creditmitra.in). The Grievance Officer can be contacted between 09:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays.