



1.1 Data Privacy Policy

Introduction and Background

Unity Small Finance Bank Ltd. (USFB), Founded by Centrum Financial Service and BharatPe, aspires to be India's first truly digital bank. Leveraging the best-in-class technology, we aim to ensure access and ease of banking for all- including the underserved. The combined expertise of Centrum and BharatPe, with a strong leadership team comprising seasoned professionals, will provide a robust foundation to realize this vision.

In line with recognized International Practice and for the information of visitors/ prospects/ customers and others who visit the USFB's website we believe it is necessary to post a privacy statement. The information shared with the USFB will be treated as private. We also desire to say explicitly that adequate precautions have been taken to protect information relating to visitors/ prospects/ customers and their dealings with the USFB from the mischievous and the fraudsters.

This privacy policy sets out how Unity Small Finance Bank Ltd. uses and protects any information that a person who visits the websites owned by USFB.

The USFB endeavors to safeguard and protect the Visitor's privacy. Visitors/ prospects/ customers confidentiality and privacy is of utmost concern to USFB. Our employees treat the information we have concerning your accounts in the same responsible and confidential way that we want our own financial affairs treated.

Policy Coverage

All persons (visitors/ prospects/ customers) who visit the websites owned by USFB and their sub-domain and who are associated with information regarding the USFB online services, as also information/ data provided through other API based mechanism are covered under this Policy. This Policy does not cover the information provided through other modes of communication to the USFB.

Recognition of USFB's expectation of privacy

USFB shall recognize that their visitors/ prospects/ customers expect privacy and security for their personal and financial affairs. USFB shall understand that, by selecting USFB for Using needs, client/customer has entrusted USFB to safeguard client/customer's personal financial information. USFB shall inform client/customers of commitment to protect the privacy of client/customer's personal financial information with the defined privacy principles and practices.

What personally identifiable information is collected from client/customer?

USFB may collect information from client/customer regarding name, addresses, email addresses, passport number, Income, PAN, details of nominees, demographic information such as preferences, interests, etc.

By providing email address, telephone numbers and other contact information, the visitors/ prospects/ customers shall agree that the USFB may contact him/her by one or more of the modes of communications.



“THE USFB WILL NEVER COLLECT INFORMATION THAT IS PERSONAL AND CONFIDENTIAL IN NATURE LIKE PASSWORDS, ATM PIN, ETC.”

Cookies

- A cookie is a data file that certain Web sites write to users' computer's hard drive when they visit such sites. A cookie file can contain information such as a user identification code that the site uses to track the pages client/customers have visited and use the information commercially. USFB shall not use cookies on its website for any of these purposes.

How we use, collect, and retain customer information

- On USFB's site, USFB may collect, retain, and use information about client/customer's only when USFB reasonably believe that it will help administer own business or provide products, services, and other opportunities to client/customer. USFB shall collect and retain information about client/customer, only for specific business purposes.

Information Use

- Open and administer client/customer's accounts and to protect their records and funds.
- Comply with all applicable laws guidelines and regulations that govern the financial services in the country.
- Understand client/customer's financial needs so that USFB can provide them with quality products and superior service. Help USFB design or improve own products and services for client/customer's benefit.
- To send periodically promotional communication about new products, special offers or other information, which the USFB thinks the visitors/ prospects/ customers, may find useful/ interesting
- To contact the visitors/ prospects/ customers periodically for market research purposes. The USFB may contact the Visitor by email/post or by any other suitable mode of communication. We may use the information to customize the website according to the Visitors'/ customers interests.

Customer data Accuracy maintenance

It is in client/customer's interest, and it is USFB's objective, to have accurate, current, and complete information concerning client/customer and their accounts. USFB shall have strict procedures that their employees abide by to meet this objective. While some procedures are required by Central, State laws or RBI regulations, USFB shall implement additional procedures to maintain accurate, current, and complete financial information, including processes to update information and remove outdated information. If client/customer believe that USFB have incorrect information about them or their accounts, they can email USFB through the feedback mechanism provided on the website or modify the profile information on the site as permissible. USFB shall correct any erroneous information as quickly as possible.

Mechanism to limit access to customer information by USFB employees

USFB shall have procedures that limit access to personally identifiable information to those employees with a business reason for knowing PI information about client/customer's.

USFB shall educate their employees on their responsibility to protect the confidentiality of visitors/ prospects/ customers information, and hold them accountable if they violate this privacy policy.



The access to the information provided through the USFB's website shall only be given to authorized employees or other USFB Group Companies or affiliates or authorized agents or service provider for normal business purposes, only on need-to-know basis; identity & confidential information of the customer/ visitor/ prospect shall not be disclosed if the data is provided to authorized agent/ service provider.

The USFB may be required, from time to time, to disclose the visitors/ prospects/ customers information to Governmental or judicial bodies or Regulators or any person to whom the USFB is under an obligation to make disclosure under the requirements of any law

USFB security procedures to protect customer information

USFB shall follow best security practices to help prevent unauthorized access to confidential information about client/customer's.

The USFB's endeavor shall ensure that information is secure. In order to prevent unauthorized access or disclosure, the USFB shall put in place suitable systems and procedures to safeguard and secure the information that it collects online. The USFB may also work with third parties for Web traffic analysis to research certain usage and activities on parts of the USFB's website. The Web analysis software may be used to find out more about the visitors/ prospects/ customers, including the visitors/ prospects/ customers demographics, behavior, and usage patterns, for more accurate reporting and to improve the effectiveness of the USFBs' marketing.

Restriction on the disclosure of customer information

USFB shall not, except otherwise required under any law, divulge any information and data relating to customers or to the affairs of the customers / constituents except in circumstances in which it is, in accordance with the law or practice and usage customary being necessary or appropriate for USFB to divulge such information.

USFB may disclose information about its constituents in the following circumstances:

- a. where such disclosure is made under compulsion of law.
- b. where such disclosure is made in discharge of its duties towards the public.
- c. where USFB interest requires such disclosure; and
- d. where the disclosure is made with expressed or implied consent of the customer."

USFB shall not release visitors/ prospects/ customers information except as above or as per your mandate. USFB shall not share specific information about customer accounts or other personally identifiable data with nonaffiliated third parties for their independent use unless:

The information is provided to help complete a transaction initiated by client/customer's request or authorize it.

client/customer's shall be informed about the possibility of such disclosure for marketing or similar purposes through a prior communication and shall be given the opportunity to decline

Privacy policy sharing applicability for client/customer's

- A potential customer who enquires about USFB's products and services or who would like a copy of USFB's privacy policy
- A customer who has established a relationship with USFB



- A potential customer who has applied for a loan
- A visitor to websites owned by USFB and their sub-domain

Internet privacy on USFB's website

For each visitor to USFB's web site, USFB may automatically recognize the following visitor information:

A visitor's Internet Service Provider and email gateway client/domain address (Gmail, outlook etc) but not specific e-mail address. For example, if client/customer's e-mail address is "amprasad@gmail.com", only the 'gmail.com' part of the address may be recognized.

Other information about USFB's web site

Children visiting USFB's web site: Disclaimer mentioning any of the information provided by USFB not to be considered as objectionable for viewing by client/customer's children to be displayed. In case client/customer's feels otherwise reporting mechanism shall be kept in place and mentioned in disclaimer itself.

Customers using USFB's Internet Service: For customers using USFB Internet, all visitor information is collected along with any information that client/customer's volunteer as a customer while using USFB's web site.

Links to, or from, USFB's web site: USFB shall not be held responsible for information practices employed by web sites linked with own web sites. Generally, links to non-USFB web sites may be provided solely as pointers to information on topics that may be useful to users of USFB's web site

Encrypted information: Information provided by client/customer's on USFB's web site shall be encrypted or scrambled in order to secure information.

Privacy policy update

The USFB may change this policy from time to time. Client/customer's may be informed to check USFB web page periodically for recent updates.

Links to other websites

The USFB's website may contain links to other websites of interest. Once the Visitor opts to link to other websites by leaving the USFB's site, the USFB shall not be responsible for protection of further disclosure of information and this Privacy Policy / statement cease to be applicable for such disclosure of information. The Visitor may therefore, informed to exercise caution and look at the privacy statement applicable to those websites.

IMPORTANT: The USFB reserves its right to amend the present Privacy Policy at any time and will place such amended Privacy Policy, if any, on its website. This Privacy Policy is neither intended to and nor does it create any contractual rights whatsoever or any other legal rights, nor does it create any obligations on the USFB in respect of any other party or on behalf of any party. By accessing this website and any of its pages you are agreeing to the terms set out above.

