

1. BACKGROUND

This Privacy Policy is framed in light of Section 43A of the Information Technology Act, 2000 read with Rule 4 of the Information Technology (Reasonable Security Practices & Procedures & Sensitive Personal Data or Information) Rules 2011, which requires SHIVAYA CAPITAL PRIVATE LIMITED (hereinafter referred to as "SHIVAYA") to provide policy for collects, receives, possess, stores, deals, handle or storage and disclosure of information. The "SHIVAYA " or any person who on behalf of "SHIVAYA collects, receives, possesses, stores, deals or handles information of provider of information, should adhere to the privacy policy for handling of or dealing in personal information including sensitive personal data or information and ensure that the same are available for view by such providers of information who has provided such information under a lawful contract. Such policy should be published on site of the "SHIVAYA".

2. PURPOSE "SHIVAYA

" intends to protect the privacy of its users and members on its site and maintain the privacy of the data provided by them to SHIVAYA from time to time and is strongly committed to protecting the personal information, including but not restricted to, Sensitive Personal and Financial Information that customer submits to us and we would endeavour to protect it from unauthorized use. This Privacy Policy provides you with details about the way your data is collected, stored, and used by us and you are advised to read this privacy policy carefully. By visiting the site, you consent to the use and disclosure of your personal information in accordance with the terms and conditions of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use or access the site. Please contact us via mail compliance@shivayacapital.com if you have additional questions or require additional information about our privacy policy. This Privacy Policy is applicable for all our ongoing online activities and is also valid for visitors who come to our website and the information that they share and/or collect in 'SHIVAYA ". Information collected offline or through channels other than this website does not fall under the purview of this Privacy Policy.

3. DEFINITIONS

"We", "our" and "us" refer to "SHIVAYA " "Site" refers to the website, mobile site, and the application that we provide and which includes a link to our Online Privacy Policy You" or "your" refers to anyone who visits, accesses, browses or uses the SHIVAYA website at <https://www.shivayacapital.com> or obtains our services through our website."

Personal Information: means any 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. Sensitive Personal and Financial Information: means such personal information that is otherwise

not available to anyone except the customer, such as password, financial information, sexual orientation, medical records, and physical, physiological, and mental health condition. Such information is generally not available in the public domain.

4. COLLECTION OF INFORMATION

While availing of service or products or using the site "SHIVAYA " may collect and process information from the customers including sensitive information that is confidential in nature but not limited to the below mentioned.

1. Information that the users provide to "SHIVAYA " by filling in forms on the website. This includes contact information such as name, email address, mailing address, phone number, financial details, family details, banking relationships, password and transaction history, etc.

2. We also collect information through supporting documents collected as per Know Your Customer (KYC) master direction issued by the Reserve Bank of India and other documents like statements of accounts, financial statements, etc. for the underwriting purpose.

3. Information that the users provide while registering for an account with us, such as name, company name, address, email address, and telephone number.

4. Other personal information provided by third parties such as credit bureaus and identity verification services.

5. Information that you provide to "SHIVAYA " when interacting with our customer support team or other team members via phone, email, online form, or other correspondence;

6. Personal information stored with third parties that you choose to provide to SHIVAYA , such as social media account information and your social media contacts. By linking your third party accounts or using third party sign-in services, you authorize SHIVAYA to have access to this information and you agree that SHIVAYA may collect and use this information in accordance with this Privacy Policy.

7. Personal testimonial information or endorsements that you voluntarily provide to us and which we may display with your name on our Sites with your consent. To update or delete your testimonial, contact us at compliance@shivayacapital.com

When the user uses the site, our servers automatically record certain information that the user's web browser sends whenever the user visits any website. Such information is known as "LOG FILES". These server logs may include information such as the user's web request, Internet Protocol (IP) address, browser type, referring/exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such

information. We use this information, which may or may not identify users, to analyze trends, administer the site, track

users movements around the site, and gather demographic information about the user base as a whole.

5. USE OF INFORMATION

The information collected by us is used in various ways to:

1. To facilitate assessment and provide credit underwriting support for sanction of credit facility.
2. To check the eligibility criteria, credit assessment, credit underwriting, and other activities incidental thereto.
3. To inform you about new offers, products, services from time to time.
4. To resolve disputes, troubleshoot concerns.
5. To help and promote safe services.
6. To Provide, operate and maintain our website
7. To Improve, personalize and expand our website
8. To Develop new products and services, features, and functionalities
9. Communicate either directly with you or through one of our partners to provide you with customer service, with updates and other website-related information, and for marketing and promotional purposes
10. To Send you emails
11. To protect and prevent fraud and other criminal activity.

6. SHARING AND TRANSFER OF INFORMATION

“SHIVAYA” may share information with individuals and body corporate in the course of normal business operations, and the customer has subscribed for, and any activity related to these services such as a collection of the fee. It may become necessary for SHIVAYA to disclose the customer’s personal information to its Lending partner or agents in the course of normal business operations for the above referred purpose. However, these parties would be required to use the information obtained from SHIVAYA for such purposes exclusively and protect the personal information, including but not restricted to, Sensitive Personal and Financial Information under a strict code of

confidentiality. We will not voluntarily disclose your personal information to any non-connected third party but in certain circumstances, we may do so if we are required by court order, by Government Authorities, by law enforcement authorities, or by other legal processes or where it becomes necessary to do so to protect the rights or property of the site and/or its group companies/affiliates, etc. We may also disclose your information to a third party as part of a merger, cooperation towards delivering services or transfer, or any restructuring. We will only use your personal information data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

7. COOKIES AND WEB BEACONS:

Like any other website, SHIVAYA collects certain information from the user's browser using small data files called "cookies". These cookies enable to store information including visitor preferences, IP addresses, and passwords, and allow visitors to secure a move to different website pages without having to re enter password information. This information is used to customize our web page content and optimize user experience based on the visitor's browser type and/or other such information. Any information collected is stored in secured databases protected by a variety of access controls and is treated as confidential information by 'SHIVAYA' The web pages of the website contain electronic images known as "web beacons" (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyze how the website is used. Web beacons may also be used in some SHIVAYA emails so as to know which emails and links recipients have opened, allowing it to gauge the effectiveness of its customer communications and marketing campaigns.

8. DATA SECURITY

We "SHIVAYA " are strongly committed to protecting the privacy of its customers and have taken all necessary and reasonable measures to protect the confidentiality of the customer information and its transmission through the world wide web and it shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Commitment or in terms of the agreements, if any, with the customer. We will limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. You are responsible for maintaining the security of your account credentials and other authentication involved in obtaining access to password-protected or secure areas. SHIVAYA will not bear any liability in respect of such unauthorized use of your account.

9. Data Retention

"SHIVAYA" shall preserve in accordance with the Section 12 of the PLM Act, 2002 to fulfil the purposes for which it was collected and as permitted by the applicable law to

comply with our legal and regulatory obligations, resolve disputes, conclude any activities related to the cancellation of an account, investigate, or prevent fraud and other inappropriate activity, to enforce our agreements, and for other business reason.

10. Link to third party websites

Our site includes links to other websites whose privacy practices may differ from those of SHIVAYA. The inclusion of a link does not imply any endorsement by SHIVAYA of the third-party website, the website's provider, or the information on the third-party website. If the users submit personal information to any of those websites, such information is governed by the privacy policies of such third party websites and SHIVAYA disclaims all responsibility or liability with respect to these policies or the websites. The users are encouraged to carefully read the privacy policy of any website that they visit.

11. Children's Information:

Another part of our priority is to ensure protection for children while using the internet. We encourage parents and guardians of children to observe and participate in monitoring and/or guiding their online activities. SHIVAYA will never knowingly collect any Personal Identifiable Information from children below the age of 13. If you think that your child has divulged any such information on our website, we strongly urge you to contact us immediately. We assure you of prompt action in removing any such information available in our records.

12. Consent

By using our site, you hereby provide consent that you agree and consent to the collection, transfer, use, storage, disclosure, and sharing of your information as described and collected by us in accordance with this Policy. If you do not agree with the Policy, please do not use or access our site.

13. General

Any change due to legislative amendment or enhancement of functionality or in the content of the site we may make changes in the privacy policy and changes will be applicable only on a prospective basis so we recommend you to review this page periodically to know about the changes. Please note that this privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

14. GRIEVANCE OFFICER

In accordance with the RBI Regulations and Information Technology Act, 2000 and the Rules made thereunder, the name and contact details of the Grievance Officer are provided below: **Name: Ram Dwarkani: Director Contact Number:8120027000, Email Address: compliance@shivayacapital.com**

15. GRIEVANCE REDRESSAL TIMEFRAME

The timeframe for addressing and resolving a complaint shall differ on a case-to-case basis, and depend upon the type and complexity of the grievance. The timelines for redressal of different kinds of complaints under this Policy is as follows:

1. General cases (other than the cases mentioned below). These include customer complaints pertaining to business practices, lending decisions, credit management, recovery and complaints relating to updating/altering credit information, etc.: 15 working days of receipt of complaint.
2. Fraud cases, legal cases and cases which require retrieval of old records and documents: 30 working days of receipt of complaint.
3. Credit-related cases: 25 working days of receipt of complaint.
4. EMI Related issue Cases: 20 Working days from the date of receipt of complaint. If any complaint needs additional time to reach a resolution, the Company will inform the complainant of the requirement of additional time and the expected timeline for the resolution of the issue.

16. Disclaimer

All the information on our website is published in good faith and for general information purposes only. SHIVAYA does not make any warranties about the completeness, reliability, and accuracy of this information. Any action you take upon the information you find on this website is strictly at your own risk. We will not be liable for any losses and/or damages in connection with the use of our site. From our site, you can visit other sites by following hyperlinks to such external sites. While we strive to provide only quality links to useful and ethical websites, we have no control over the content and nature of these sites. These links to other websites do not imply a recommendation for all the content found on these sites. Site owners and content may change without notice and

may occur before we have the opportunity to remove a link that may have gone 'bad'. Please be also aware that when you leave our website, other sites may have different privacy policies and terms that are beyond our control. Please be sure to check the Privacy Policies of these sites as well as their "Terms of Service" before engaging in any business or uploading any information.

17. Review of the Policy

The Policy should be subjected to an annual or earlier review by the management and modifications, if any warranted, should be taken up for the approval of the Board. If there are any amendments in the regulations, revision in the policy should be staged for Board's approval in the immediately ensuing Board Meeting, after the amendments are notified by the regulation.