



Narendra Finance

PRIVACY POLICY

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Revision History

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PRIVACY POLICY

Narendra Finance Company Private Limited having its registered office at Narendra Finance Co Pvt Ltd, 1525, 15th Main, M.C. Layout, Vijaynagar, Karnataka, India, 560040 (“our”, “we”, and “us”) respect the privacy of a natural person (“user”, “you”, “your”), and are committed to protecting it in accordance with the terms of this privacy policy (“Policy”) when you access, browse or use our website available at <https://nfcpl.in/> (“Website”).

1. General

- 1.1 This Policy describes the types of information we may collect from you or that you may provide to us when you use or access the Website, and lays down our practices and purposes for collecting, receiving, processing, storing, dealing, using, maintaining, transferring, and disclosing such information.
- 1.2 This Policy does not apply to information collected by: (a) us in physical form and not in a computer resource; or (b) any third party, including through any website, application or content (including advertising) that may link to or be accessible from our Website.
- 1.3 Please read this Policy carefully to understand our policies and practices regarding your Information (*defined below*). By accessing our Website, you agree to and accept the practices described in this Policy. If you do not agree with the terms of this Policy, please do not access the Website. You agree that the Information provided to us by you has been received or collected by lawful means with your consent and does not constitute a violation of data protection laws of India.

2. Information We Collect and Store About You

- 2.1. We may collect or receive Information voluntarily given by you with your consent when you access the Website. The collection and use of sensitive personal information (*as defined under applicable law*) hereunder is on a need-to-know basis to deliver better service to the customers. We may combine non-personal information with personal information, and in those circumstances, we will treat the combined information as personal information. We may collect or receive from you, *inter alia*, the following information when you access the Website (“Information”):

- (a) **Usage and Device Data-** This includes information about how you use the Services. Usage Data may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type

of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers, Name and Version of system and application software; Other information collected: Installed applications on User's device; crash logs, diagnostic and other app performance data, such as- App launch time to improve user experience, etc.

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

- (b) Inquiry information, such as your questions/feedback to us or survey responses; and/or
- (c) Location of your device for activities such as serviceability, fraud prevention and onboarding purposes in case of Loan Application
- (d) **KYC Data-** This includes identification documents issued by the government or other authorities which includes one of Officially Valid Documents specified in RBI-KYC directions (Driving License, Voter's ID, NREGA Job Card, Passport, Aadhaar card, PAN). NFCPL may ask for one time access to camera for customer onboarding/said KYC process.
- (e) We and our authorized service provider (Exotel) shall access all your SMSs and collect the SMSs with alphabetic or less-than-10-characters numeric sender name only. When the user grants permission, this app and our authorized service provider (Exotel) accesses, reads, collects, and uses the collected SMSs solely for verifying your financial position and assessing your credit risk to enable loan, even when the user is not engaging with the app.
- (f) This includes your past credit history, income details, details of loans issued or otherwise applied for through the Platform, payments and repayments thereof, your bank account details, and bank account statements only in case of loan application.
- (g) **Marketing and Communication Data:** This includes your preferences in receiving marketing messages from us and our third parties and your communication preferences.
- (h) Our app/website does not access your device storage or media, however, the Company may ask you to select and upload specific images or documents which will be specific to your KYC or underwriting data or related to addressing the complaints raised by you.
- (i) **Miscellaneous data:** This includes Credit and debit card number (last 4 digits) WiFi connection information and any information collected by us regarding you available in the public domain. We may also collect the application and package name for each application installed on your device for fraud prevention purpose.

We may receive Personal information about you from third parties, such as social media services, commercially available sources and business partners. If you access Website through a social media service or connect a service on Website to a social media service, the information we collect may include your user name associated with that social media service, any information or content the social media service has the right to share with us, , and any information you have made public in connection with that social media service. When you access the Website through social media services or when you connect any Website to social media services, you are authorizing NFCPL to collect, store, and use and retain such information and content in accordance with this Privacy Policy.

We use this information to provide our Service and to improve and customize the features of our Service.

You can disable access for these permissions in your device settings at any time, or revoke/withdraw access rights from the application, however we recommend that you keep these permissions enabled so that we can provide you uninterrupted service.

3. **How We Collect Your Information**

3.1. We collect your Information from various sources that may include, for example, the following:

- (a) You. Information you provide directly when you use or otherwise interact with the Website.
- (b) Your Browser or Device. Information collected automatically as a result of your interaction with the Website. The Information that we automatically collect, include your IP address, geolocation information (which may include specific longitude and latitude), time zone, usage times and volume, and information about the device you are using (for example, device type, device ID, characteristics and status, browser type, operating system and application version and information about how our Website is used), language preference, URL click stream, or information that we collect through our marketing activities. We also use cookies including browser cookies.
- (c) Third Parties. Information we collect about you from third parties or from our service providers and partners.

4. **How We Use Your Information**

4.1. We use the Information that we collect about you or that you provide to us in the following manner:

- (a) To provide you with access to our Website.

- (b) To provide you with products or services that you request from us from time to time.
- (c) For internal recordkeeping and analytical purposes including data analysis, auditing and research.
- (d) To inform you about promotions, events, updates, offers and news related to the Website.
- (e) To fulfil any other purpose for which you provide your Information.
- (f) To comply with any legal or regulatory requirement or comply with a request from any governmental or judicial authority.
- (g) To provide customer support service or resolve any request, dispute, grievance or complaint raised by you in relation to your use of the Website.

5. **Disclosure of Your Information**

5.1. We may from time to time, disclose personal information about you in anonymous form, non-personal information or information that does not identify you or any individual with any third party, service providers, our affiliates for, *inter alia*, commercial, research, statistical analysis and business intelligence purposes. You agree and understand that such anonymous data is owned by us and we may, in our sole and absolute discretion, sell or otherwise transfer such research, statistical or intelligence data in an anonymous or non-personally identifiable form to third parties and affiliates which may include our advertisers, sponsors, investors, strategic partners, in order to help grow our business.

5.2. By using, accessing or browsing our Website, you consent to the disclosure of your Information by us, in accordance with the terms of this Policy. We may disclose Information that we collect, receive or you provide as described in this Policy in the following manner:

- (a) To our employees, subsidiaries and affiliates on a need-to-know basis.
- (b) To our contractors, service providers and other third parties who we use to support our Website.
- (c) For any other purpose disclosed by us when you provide the Information.
- (d) To comply with any court order, law or legal process, including responding to any government or regulatory request or authorized agency.
- (e) To enforce or apply other agreements, including for billing and collection purposes.
- (f) If we believe disclosure is necessary or appropriate to protect our rights, property, or safety, or the rights, property, or safety of our customers or any third party.

5.3. We shall not publish the sensitive personal information (*as defined under applicable law*)

collected by us hereunder and any third party receiving such information shall not disclose the same further.

6. **Choices About How We Use and Disclose Your Information**

6.1. We strive to provide you with choices regarding the Information you provide to us. We have created mechanisms to provide you with the following control over your Information:

- (a) **Review of Information:** You may at any time request our grievance officer in terms of Clause 11 below to review the Information that you have provided to us. We will not be responsible for the authenticity of the Information provided by you to us.
- (b) **Withdrawing Consent:** You may at any-time withdraw your consent for collection and use of your Information. However, please note that if you withdraw your consent, we may no longer be able to provide you with the corresponding service for which you have withdrawn your consent. It is hereby clarified that your decision to withdraw your consent will not affect the processing of the Information based on your previous consent prior to the withdrawal and a separate request for removal will be required in such cases.
- (c) **Deletion of Information:** To request the deletion of your account or Information, you may raise a request through the Platform or emailing us at grievances@nfcpl.in. We reserve the right to limit membership based on availability of contact information. All users will be notified by email prior to any actions taken.
- (d) **Transfer of Your Information to Third-Party.** We do not sell, trade, or otherwise transfer your Information unless we seek your prior consent. However, this does not include Website hosting partners, service providers and other third parties who assist us in operating our Website, conducting our business, or providing us services, whether located within India or abroad. By using our Website, you consent to such transfer of Information to, *inter alia*, Website hosting partners, service providers and other third parties.

7. **Third Party Links on Our Website**

7.1. The Website may contain links to other third-party websites for your convenience. You agree and understand that we do not exercise control over third party websites displayed as search results or links on the Website. These other sites may place their own cookies or other files on your computer, collect data or solicit Information from you, on which we have no control and shall not be held responsible or liable. We do not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor do we guarantee the accuracy, integrity, or quality of the information, data, text, software, sound,

photographs, graphics, videos, messages or other materials available on such websites.

- 7.2. You agree and understand the inclusion or exclusion of such third-party links does not imply any endorsement by us of such websites, the websites' provider, or the information on the website. Once you leave the Website or are redirected to a third-party website, application, or other online service, we encourage you to read the privacy policy applicable to that third party.

8. **Data Processing and Security**

Security of your Information is of utmost importance for us. We have adopted security measures that are in line with the industry standards and applicable law to protect the Information that you provide to us, and to prevent unauthorized access, public disclosure, use, modification, damage or loss such Information. We take all reasonable and practical steps to protect your Information and actively pass relevant security and privacy protection certifications.

9. **Changes to Our Privacy Policy**

We may need to modify the terms of this Policy from time to time and we encourage you to review this Policy regularly. Any changes or modifications will be effective immediately upon posting the revisions on the Website and you will be bound by such revised/ modified terms of the Policy.

10. **Retention of Information**

We will retain your Information and any data for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted under the applicable law.

11. **Grievance Redressal**

In case, you have any questions, grievance or complaints about this Policy, or the Website, you may contact our grievance officer on the below mentioned details:

Name: Mrs. Anindeeta Chakraborty

Email Address: Grievances@nfcp.in

Contact Address: +91- 9667712308

We will try to resolve your complaint/ request expeditiously, and in case within the prescribed timelines under applicable laws. However, this is also subject to us receiving all pertinent information/ documents from you in a timely manner.

Last Updated: March 06, 2025