

PRIVACY POLICY

KUSHAL FINNOVATION CAPITAL PRIVATE LIMITED

Version	Date	Reviewer	Approver	Document Changes
1.0		Legal and Compliance	Board of Directors	Implementation of the Policy

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We at Kushal Finnovation Capital Private Limited ("KFCPL", "we," "us," or "our") know that our users ("you," "your," or "yourself") care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. **By visiting or using the KFCPL websites and domain names, any other linked pages, features, content, digital lending application of the Lending Service Provider of KFCPL, and any other services we offer from time to time in connection with any of the foregoing (collectively, the "Services"), you agree to the practices and policies set forth in this Privacy Policy, and you hereby acknowledge and consent to our collection, use, and sharing of your information as described in this Privacy Policy.**

I. WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy covers our treatment of personally identifiable information which includes but not limited to any data about an individual who is identifiable by or in relation to such data ("Personal Information") that we gather when you are accessing or using our website. This policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage, even if you have accessed the websites or services of those companies through our website.

II. ARE CHILDREN ALLOWED TO USE OUR WEBSITE?

No children are allowed to use our Services and products since use of our Services is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872.

III. WHAT INFORMATION DOES KFCPL COLLECT?

We gather various types of Personal Information from our users, as explained more fully below. We may use this Personal Information to, among other things, personalize and improve our services, allow our users to set up a user account and profile, contact users, fulfil your requests for certain products and services, analyse how users utilize the Website, or as otherwise set forth in this Privacy Policy. We may share certain types of Personal Information with third parties (as described in this Section and in Section V below). We collect the following types of information:

A. Information You Provide to Us:

We receive and store any information you knowingly provide to us as per the required consent obligation as per Digital Personal Data Protection Act, 2023. For example, we collect Personal Information including but not necessarily limited to your name, username, phone number and other billing information, email address, shipping address. You can choose not to provide us with any or all the information we specify or request, but then you may not be able to register with us or to take advantage of some or all of our features. It is your responsibility to ensure that the information you provide us is not false, inaccurate, out of date or misleading information.

We may anonymize your Personal Information so that you cannot be individually identified and provide that anonymized information to our partners. For example, we allow advertisers to choose the demographic information of users who will see their advertisements and you agree that we may use any of the information we have collected from you in non-personally identifiable form to allow our advertisers to select the appropriate audience for those advertisements.

Further, If you avail our Services, we shall retain, on our servers, details provided by you with respect to your requirements. We shall, however, ensure that we maintain reasonable information security practices and procedures in compliance with the Information Technology (Reasonable security practices and

procedures and sensitive personal data or information) Rules, 2011. We shall not share your telecom bills with any third party.

For registration purposes, we may collect personal details such as your name, mobile number, email ID, date of birth, etc.

For providing certain services, we may require supplementary information, including but not limited to your residential address, financial details, credit score, credit/debit card specifics, Driving License, Voter ID and Permanent Account Number (PAN) or any other officially valid documents (OVDs).

Not sharing the requisite data may lead to certain features being restricted, unavailable, or unusable.

Usage and purpose of processing the personal data:

The abovementioned personal data will be fetched only after getting your consent based on the purpose for which the data has been collected.

We process the personal data for the following purposes, based on the following legal grounds:

Purpose of the processing	Legal basis for the processing
Communicate with you and tell you about our Products and related events	Pursue legitimate interests to provide services
Provide, improve and facilitate the delivery of our Products that you request	Fulfill contractual obligations, or if you represent a legal entity, to pursue our legitimate interests
Respond to your comments or questions or provide information requested by you	Fulfill contractual obligations
Improve the content and general administration of the Site and our services	Pursue legitimate interests to provide services
Provide our support services	Fulfill contractual obligations
Better understand how the Site is used	Pursue legitimate interests to provide services

B. Information Collected Automatically:

Whenever you interact with our website, we automatically receive and record information on our server logs from your browser including your IP address, "cookie" information, and the page you requested. "Cookies" are identifiers we transfer to your computer or device that allow us to recognize your browser or device and tell us how and when pages in our website are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your computer's or device's acceptance of cookies, but doing so may prevent you from taking advantage of our Website's best features. Our advertising partners may transmit cookies to your computer or device when you click on ads that appear on our site. This Privacy Policy does not cover cookies delivered to you by any of our advertisers.

Information collected automatically may include but not be limited to your browser type, operating system, IP address and the domain name from which you accessed the Site. In addition, we may collect information about your browsing behaviour, such as the date and time you visit the Site, the areas, or pages of the Site that you visit, the amount of time you spend viewing the Site, the number of times you return to the Site and other click-stream data. If we provide usage information (such as the numbers and frequency of visitors to the Website and to which pages within the Website) to our partners, we will only provide such data in aggregate form, in a manner that assures your anonymity. We may provide this aggregate usage information to our partners; our partners may use such information to understand how often and in what ways people use our website, so that our partners, too, can endeavour to provide you with an optimal online experience. For example, we may place a cookie on your device that records what products you have viewed on our website, and then provide that information, in non-personally identifiable form, to a third-party website, to allow such website to show you ads for similar products that are available from us or from third parties.

We may also deliver a file to you through the Website (known as a "web beacon") from an advertising network we have contracted with. Web beacons allow advertising networks to provide anonymized, aggregated auditing, research, and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. These beacons may, for example, log that you have viewed a certain product on our website and then show you an ad for similar products when you browse to another website. Because your web browser must request these advertisements and web beacons from the ad network's servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their site. Many ad networks participate in the Network Advertising Initiative ("NAI"), a cooperative of online marketing and analytics companies committed to building consumer awareness and establishing responsible business and data management practices and standards, and such NAI members may allow you to opt-out of cookies or beacons they deliver. Again, we do not control the policies of any third parties, including advertising networks.

Information generated through the use of our Digital Lending App: Through your utilization of our application or website, we gather information such as:

Details pertaining to the services you avail through our application, your usage of the application, rewards claimed, and transactional details relating to your usage of our services. This encompasses the types of services you request, your chosen method of payment, the amount, and other related transactional and financial data. You will also generate data during your general interaction while using the application, including during customer support instances.

When you access our application or websites, we may log specific information including but not limited to your IP address, browser type, mobile operating system, the manufacturer and model of your mobile device, geolocation, preferred language, access time, and duration of use.

Information we collect from third parties: We may request certain third parties to provide information about you to furnish specific services and authenticate your information.

To use the application, you hereby provide your explicit consent for procuring your credit information from our bureau partners during the onboarding process for your credit limit activation. Our bureau partners are credit information companies registered under the Credit Information Companies (Regulation) Act 2005.

To access our services you hereby provide your explicit consent to undertake the Know Your Customer (KYC) process, which may entail us and/or our lending service provider procuring your KYC data from one or more KYC registries.

To effectuate a financial transaction, we may disseminate financial information provided by you (such as payment mode particulars) to authorized third parties, for instance, our business associates, financial institutions, or government authorities involved in the fulfilment of the said transactions.

C. E-mail and Other Communications:

We may contact you, by email or other means. For example, we may send you updates about new products, promotional offers, or communicate with you about your use of the Website. Also, we may receive a confirmation when you open an email from us. If you do not want to receive email or other mail from us, please indicate your preference by changing your account settings accordingly or email us at compliance@kfcpl.co.in.

IV. WHY DO WE COLLECT THIS INFORMATION?

The primary reason we gather information is for customer service. We also use this information to improve our services, website content and navigation, monitor usage of our website and diagnose problems with our server, gather broad demographic information and provide you with customized content and advertising, including sending you information about new products or promotions using WhatsApp and / or SMS.

V. CONSENT OBLIGATION AND DATA RETENTION UNDER THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023

For compliance under the Digital Personal Data Protection Act, 2023, you hereby voluntarily and without any coercion, give a valid, binding, and explicit authorization and consent for procuring, storing, processing and usage of information including but not limited to personal information as covered under this Privacy Policy and any other information as may be required to fulfil various obligations related to the Services and under applicable laws, rules, regulations, and guidelines and agree to take all the necessary actions required for the purpose of usage, authentication, and verification of such information.

Data Retention: Retention of personal data is only for the duration necessary for us to fulfil the purposes mentioned in the privacy policy. Personal Data will be retained only for the duration necessary to fulfill the purposes elucidated in this Privacy Policy, unless a longer retention period is necessitated by law or for directly related legitimate business purposes. Once the Personal Data is no longer required, it will be disposed of securely under due intimation to you.

VI. WILL KFCPL SHARE ANY OF THE PERSONAL INFORMATION IT RECEIVES?

We neither rent nor sell your Personal Information in personally identifiable form to anyone. We share your Personal Information in personally identifiable form with third parties, including service providers that may be onboarded from time to time pursuant to completion of requisite due diligence, as described below:

A. Affiliated Businesses and Third-Party Websites We Do Not Control:

In certain situations, businesses or third-party websites we're affiliated with may sell items or provide services to you through the Website (either alone or jointly with us). You can recognize when an affiliated

business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that we deem it related to such transaction or service. One such service may include the ability for you to automatically transmit information from your Bharat Khata account to an account on a third-party website or service. We have no control over the policies and practices of third-party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

B. Agents

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Examples include sending postal mail, e-mails, SMSs and Whatsapp messages, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments and providing customer service. Unless we inform you otherwise, our agents do not have any right to use the Personal Information we share with them beyond what we deem necessary to assist us in performing such tasks.

We directly or through our lending service provider, use the following sub-contractors/technology service providers to help us provide better Service to you. Some of your data/data concerning the Services may be shared with the following entities and/or stored in their systems:

- ❖ For Identity Verification: Perfios Software Solutions Private Limited, Hyperverge Technologies Private Limited, Signzy Technologies Private Limited, AuthBridge Research Services Private Limited, Bureau id India Private Limited
- ❖ For e-signing: Digiotech Solutions Private Limited
- ❖ Bank verification/Nach Setup: Digiotech Solutions Private Limited, Desk Nine Private Limited, Cashfree Payments India Private Limited.
- ❖ For analytics and Communications: Google Inc.
- ❖ Underwriting: CRIF High Mark Credit Information Services Private Limited., TransUnion CIBIL Limited, Digitap.Ai Enterprise Solutions Private Limited.
- ❖ Repayments: Analog Legalhub Technology Solution Private Limited, Razorpay Technologies Private Limited, Fino Payments Bank Limited, Yes Bank Limited, Conflux Technologies Private Limited (LMS).
- ❖ Infrastructure: Amazon Web Services, Inc. and Google Inc.

C. User Profiles and Content:

Certain user profile information, including without limitation a user's username and the image content that such user has uploaded to the website may be displayed to other users to facilitate user interaction within the Website or address your request for our services. Any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by others. Your username may also be displayed to other users if you post comments or upload images through the Website and other users can contact you through such

comments. If you sign into the Services through Facebook Connect, your list of “friends” from Facebook may be automatically imported to the Services, and such “friends,” if they are also registered users of the Services, may be able to access certain non-public information you have entered in your services user profile. Again, we do not control the policies and practices of any other third-party site or service.

D. Business Transfers:

We may choose to buy or sell assets. In these types of transactions, customer information (which may include your Personal Information) is typically one of the business assets that is transferred. Also, if we (or substantially all our assets) are acquired, or if we go out of business or enter bankruptcy, Personal Information would be one of the assets transferred to or acquired by a third party.

E. Protection of KFCPL and Others:

We may release Personal Information when we believe in good faith that release is necessary to comply with laws of India; enforce or apply our conditions of use and/or other agreements; or protect the rights, property, or safety of KFCPL, our employees, our users, or others. We may exchange information with other companies and organizations (including governmental authorities) for fraud protection and credit risk reduction.

F. With Your Consent:

Except as set forth in this Privacy Policy, you will be notified when your Personal Information may be shared with third parties and / or other registered users or service providers at your request or with your consent and will be able to prevent the sharing of this information.

VII. IS PERSONAL INFORMATION ABOUT ME SECURE?

Your account is protected by a password for your privacy and security. You need to prevent unauthorized access to your account and Personal Information by selecting and protecting your password (or other sign-on protections) appropriately and limiting access to your computer or device by signing off after you have finished accessing your account.

We endeavour to protect the privacy of your account and other Personal Information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time.

The Website may contain links to other sites. We are not responsible for the content or services on such other sites, nor for their privacy policies and/or practices. When following a link to another site you should read that site's privacy policy.

VIII. WHAT PERSONAL INFORMATION CAN I ACCESS?

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

Name And Password
Contact Number
Location
Business GST Number
User PAN Number

Email Address

Billing Information

User Profile Information and User Content, including images you have uploaded to the site.

The information you can view, and update may change as the Website changes. If you have any questions about viewing or updating information, we have on file about you, please contact us at compliance@kfcpl.co.in.

IX. WHAT CHOICES DO I HAVE?

You can always elect not to disclose information to us and with respect to the consent already provided by you, you shall have the right to withdraw such consent at any time, with the ease of doing so by just writing to us at compliance@kfcpl.co.in.

However, please note that we may need some information to allow you to onboard and register with us or to offer some or all of our features, and if you choose not to provide that information, your ability to use our Website and services may be less efficient to the extent of not being able to avail the full benefits of the Services. We shall not retain your Information if it is no longer required by Us and there is no legal requirement to retain the same under any applicable law. Please note that multiple legal bases may exist in parallel, and We may still have to retain certain Information at any time.

You may be able to add, update, or delete information as explained in Section VII above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by visiting your account settings. Please note that some information may remain in our private records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information even if you update or delete it, but we will not use that information in a manner that would identify you personally.

If you do not wish to receive email or other mail from us, please change your account settings accordingly. Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Website, and you are responsible for reviewing such legal notices for changes.

X. IN COMPLIANCE WITH RBI'S DIGITAL LENDING DIRECTIONS:

Greenizon Agritech Consultancy Private Limited operates as a lending service provider (LSP) to KFCPL. Be advised that, in addition to this privacy policy, you may be subject to the privacy policy and terms of use of the lending service provider as well as other obligations stipulated in the loan documents.

Data Collection and Usage:

- During availment of our Services, we may share data you have previously provided with us. Additional information may be required during the application process. Information specifically provided to access Services or generated upon successful receipt of credit will be retained to the extent required by us to fulfill the required obligations.
- Pertaining to the information specifically provided during the application process, we adhere to a clear policy guideline regarding the storage of customer data, including data type, storage duration, data usage restrictions, data destruction protocol, security breach handling standards, which can be accessed by writing to us at compliance@kfcpl.co.in. The lending service provider shall be given access to such retained data by us, only for the required purpose, and the above-mentioned data shall be retained in our database.

- We will not collect or store biometric data.
- We will not access mobile phone resources such as files and media, contact lists, call logs, telephony functions, etc., in relation to the Services. However, with your explicit prior consent, we may seek one-time access to facilities like the camera, microphone, location, or any other necessity for onboarding/KYC requirements in connection with our Services.

Access Revocation and Data Deletion: You may revoke access to various access permissions including but not limited to contacts permission and SMS permission by writing to us at compliance@kfcpl.co.in. However, We may still retain data as required by applicable law, to the extent that any amounts are outstanding under any Credit Products or till the time approved in-principle credit limit is available to You, or to the extent any fraud or fraudulent transactions are suspected in connection with the Credit Products.

Data Storage, Retention, Handling and Destruction:

KFCPL shall retain/store User's Information in India if it is required to provide services or as long as it is required for business purpose. Retention of Information will be as per applicable law/ regulatory requirements in India.

KFCPL may retain the following kinds of information (not exhaustive):

Sr. No.	Kinds of Information	Retention Period
1.	KYC Documents (Identity and Address proof, and Account Opening Form)	During the tenure of relationship and At least Five years after cessation of the relationship
2.	Loan Files containing documents like Application Form. Income Documents, agreements etc., collected at the time of opening account and thereafter in respect of Closed Account	During the tenure of relationship and 5 years from closure of Loan
3.	Audit and access logs	5 Years
4.	All necessary records of transactions between the KFCPL and you	5 Years from the date of transaction
5.	Communication records	3 years

Information may be retained for an extended period (i) in case of requirement of any investigations under law or as part of any requirement before Courts/Tribunals/Forums/Commissions etc. and (ii) to enhance / improvise the products/services of KFCPL.

KFCPL ensures that access to your data is sufficiently restricted using access controls and industry standard encryption algorithms. Further, KFCPL has in place a robust incident management system along with a proactive incident response posture. If retaining your data is no longer necessary, we make every effort to securely destroy or delete it as per applicable regulations.

Website & links to Other Sites

During availing our Services, you may come across various websites and links to the other sites. If you click on a third-party link, you may be directed to that site. It may be noted that such external sites are not

operated by KFCPL and is beyond the control of KFCPL. Therefore, KFCPL strongly advises you to review the privacy terms/policy of such external websites/ electronic applications. KFCPL has no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

XI. CHANGES TO THIS PRIVACY POLICY

We may amend or modify this Privacy Policy from time to time, so please review it frequently. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on our website or contacting you directly via email or other means. You are bound by any changes to the Privacy Policy when you use the Website after such changes have been first posted.

XII. QUESTIONS OR CONCERNS

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to compliance@kfcpl.co.in. We will make every effort to resolve your concerns.

XIII. GRIEVANCE OFFICER

If you have any Complaint, you can follow the below process for its redressal:

Principal Nodal Grievance Officer: Mr. Rakesh Gaud

Email: rakesh.gaud@kfcpl.co.in

In case, you are not satisfied with the response or the resolution provided by the Principal Nodal Officer or the Complaint is still not resolved within the period of 9 (Nine) days from the date of receipt of Complaint by the Principal Nodal Officer, you may file a complaint with RBI Ombudsman at <https://cms.rbi.org.in/cms/indexpage.html#eng>. Alternatively, if the you are not satisfied with the response or the resolution provided by the Principal Nodal Officer or the Complaint is still not resolved within the period of 9 (Nine) days from the date of receipt of Complaint by the Principal Nodal Officer, you may file an appeal with the Officer-in-Charge of the Department of Supervision (NBFCs) of Reserve Bank of India's Bengaluru Regional Office. The contact details of such Officer-in-Charge maybe taken from the website of the Reserve Bank of India.

XIV. SECURITY AND COMPLIANCE WITH INFORMATION TECHNOLOGY (REASONABLE SECURITY PRACTICES AND PROCEDURES AND SENSITIVE PERSONAL DATA OR INFORMATION) RULES 2011

We hereby state that, to the best of our knowledge, we are, and shall remain, fully compliant with all requirements of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011. We further state that, apart from complying with applicable regulations, we also follow industry best practices to ensure that your Personal Information is not inappropriately used, disclosed, altered, destroyed or misplaced.

XIV. Policy Review

This policy shall be reviewed annually or earlier if necessitated by statutory or operational changes.