



“ Think Better
Do Better”

Vinayana Investment and Finance Ltd.

Privacy Policy

We, at Vinayana Investment and Finance Ltd. (“**Vinayana**” or “**We**” or “**VIFL**”) understand Privacy and its value. Therefore, it is all the more important for us to make **You** (“**You**” or “**Customer**” or “**User**” or “**Borrower**”), the User of the website <https://vinayanafininvest.co.in> (the “**Website**”) and its associated mobile applications, **VIFL** (“**Application**” or “**App**”) (collectively, the “**Platform**”) understand the reason behind collection of your information and its usage and the manner in which we collect, use, store and share information about you (“**Privacy Policy**”). This Privacy Policy has been prepared in compliance with:

- a. Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- b. Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021
- c. Guidelines on Digital Lending issued by the Reserve Bank of India (RBI), 2022;
- d. Other applicable acts, regulations and rules which require the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information and all applicable laws, regulations, guidelines provided by applicable regulatory authorities including but not limited to the RBI.

CONSENT

You hereby expressly consent to provide the information that may be required in relation to the Services (as defined below) being rendered on the Platform by us. You acknowledge that we shall collect the information detailed under this Privacy Policy to facilitate lending & non-lending services by partnering with various financial lenders, third parties, service providers, etc based on your requirement to avail such Services (“**Services**”).

VIFL will only be using the information for providing the Services to you.

In order to avail any Services being provided by VIFL by itself or in partnership with the lenders or other third parties it is important that YOU READ, UNDERSTAND, ACKNOWLEDGE AND UNCONDITIONALLY AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY.

IF YOU DO NOT AGREE TO THIS POLICY OR ANY PART THEREOF, PLEASE DO NOT USE/ ACCESS/ DOWNLOAD/ INSTALL THE PLATFORM OR ANY PART THEREOF.

For the users consenting to continue accessing the Platform and avail the Services, this Privacy Policy explains our policies and practices regarding the collection, use, and disclosure of Your information.

COLLECTION OF INFORMATION

The collection of information under this Privacy Policy are conducted for the following categories of services:

(i) Part A: Information for Digital Lending Services: Information collected by Platform for facilitation of Loans being disbursed by the financial lending partners whose details are available on the Website and the Application and who are registered with the Reserve Bank of India (“**Lending Partners**”).

(ii) Part B: Information for Non-Lending Services: Information collected by Platform while registering a User on the Platform or while providing Value Added Services (i.e. all services other than facilitation of loans).

A. Information we collect about you

In order to facilitate the lending and non-lending services, VIFL will be required to access, collect and share Personal Information with its lending partners that may be banks or NBFCs registered with the Reserve Bank of India or any other third-party providing value added services in partnership with VIFL. In such cases, VIFL will share the information securely and ensure that all personal information recipients comply with confidentiality, fidelity and secrecy obligations and sign covenants in this regard. VIFL may make information available to third parties that are financial and non-financial companies, government agencies, courts, legal investigators, and other non-affiliated third parties as requested by You or Your authorized representative, or otherwise when required or permitted by law.

1. User Personal Information: The data points we collect from You for both lending and non-lending services include, inter alia, your full name, email id, PAN, GST Network user id & password, address, mobile number, postal code.

2. Social Account Information: VIFL may provide you with the option to register using social accounts (Google) to access the app and shall collect only such registered email id and user public profile information like name, email depending on the platform used by You to log-into the Application during registration/ sign in process in the Platform. How we use this information: We may collect and store email id, name and address associated with that account for the purpose of verification and to pre-populate relevant fields in the course of Platform interface. However, we shall not collect / store account passwords.

3. SMS Information: VIFL doesn't collect, read or store personal SMS from your Inbox. We collect and monitor only financial transactional SMS, such as, bank related transactions, the names of the transacting parties, a description of the transaction and the amount of the transaction for the purpose of performing credit risk assessment. We monitor only SMS sent by 6 - digit alphanumeric senders. How we use this information: We use this data to provide you with updates or confirmation of any actions taken in our Platform during the term of Services. We shall collect SMS information related to financial transaction for facilitating you lending and non-lending service including such purposes as may be required by the Lending Partners or as per applicable law. This category of information is only collected for providing the non-lending services or our value-added services.

4. Device Information and Installed Apps data: We additionally collect certain device information provided herein for our lending and non-lending services. Information which the Application collects, and its usage, depends on how you manage your privacy controls on your device. (i) Device Information: When you install the Application, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the Application and explicitly seek permissions from You to get the required information from the device. Additionally, we also collect your Log information (via the domain server through which the User accesses the App Search queries, IP address, crashes, date etc for the purpose of improvising the Application functionality. In addition to the above, we also track and collect the data related to the performance of the Application and other diagnostic data for identifying and resolving any technical glitches that may be identified from such data and also for improving the overall functionality of the Application. How we use the information: We collect information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behaviour, thereby allowing us to improve our products interaction, quality of services and provide an enhanced customized user experience to you. We further collect other identifiable information such as your transaction history on the Platform when

you set up a free account with us. (ii) Installed Application Data: We collect and transmit a list of specific installed applications' metadata information which includes the application name, package name, installed time, updated time, version name and version code of each installed application on your device. This data may be collected even when the app is closed or not in use. How we use this information: We use this information for your onboarding and Know Your Customer (KYC) purpose with your explicit consent.

5. Location, Camera, Microphone Access: We will collect your device location and request camera and microphone access for facilitating lending services as well as providing any non-lending services only in accordance with applicable laws. How we use this information: We shall collect your device location information for verifying your address, for the KYC and onboarding process for the Services. We may request camera access to capture your image for identity verification required for processing loan and as per the instructions of our Lending Partners in accordance with applicable laws. We shall transfer such information to our Lending Partners and shall not store any such data. We require microphone permissions to enable a two-way communication between our authorised agents and you for the purpose of performing and completing your Video KYC for the Lending Services. Your audio shall be recorded for regulatory purpose.

B. Information about you we collect from third parties

For making the Services available to you, we may collect credit information by obtaining specific authorisations from you (if required under applicable laws), from certain third parties such as credit bureaus or credit rating companies as your 'authorised representative' from time to time in accordance with applicable laws during the loan journey as may be requested by our Lending Partners.

In order to facilitate credit products to you, we may receive certain information pertaining to document verification, repayment status etc from certain third parties including NSDL, payment gateway providers.

We may further collect your GST details from Official GSTIN API stack or other relevant websites using the GST Network user id and password details or OTP as provided by you.

We may further collect your bank account numbers or UPI payment information on behalf of our lending partners to facilitate collection and repayment of loan.

We shall only collect this information on a need basis strictly for the purpose of providing you with the Services. The information collected from such third parties are not retained by us. We collect this information as part of our outsourcing obligations to our Lending Partners and is directly transferred to the Lending Partners upon collection.

C. Information you give us about you

In due course of using our Services, you are required to submit data to enable our Services. We use this data to create your profile and provide you with the best available services. Mentioned below is some of the data we collect from you:

- a. Data provided by you by filling in forms in the Application or on the Website.
- b. Data provided by corresponding with us (for example, by e-mail or chat).
- c. Data and information, you provide when you register to use the Website, download or register on our App, subscribe to any of our Services (such as applying for a loan), search for a Service, and when you report a problem with our App, our Services, or any of our Sites.

- d. Data including your name, address, gender, date of birth, e-mail address, phone number, username, password and other registration information.
- e. PAN Card, Aadhaar Card, financial information such as employer name, monthly salary, bank account no., bank statements, credit information, GST information, copies of identification documents which are forwarded to our Lending Partners for the onboarding of your application to avail the services.
- f. Data generated by your usage of our Platform

This data helps us create your profiles, complete mandatory KYC as per the requirements of our Lending Partners who offer you the Services, unlock and approve loans and provide you with customized support in case of issues. Please note that we do not store any data provided by you except for the basic information such as name, address, contact details etc.

Wherever possible, we indicate the mandatory and the optional fields. You always have the option to not provide any information by choosing not to use a particular service or feature on the Platform. While you can browse some sections of our Platform without being a registered member as mentioned above, certain activities (such as availing of loans from the third-party lenders on the Platform) require registration and for you to provide the above details.

We under no circumstances and at no point take any biometric data from you for any of our services or operations. In case, if any of our representatives ask for the same from you, we request you to kindly refrain from doing the same and address this concern to our Grievance Officer (the details of the same have been provided below).

D. Storage of Personal Information

For the provision of lending Services, we shall only store basic personal information such as name, address, contact information which are required to be stored for carrying out our non-lending services. We ensure that every data or information that we collect from you is stored in servers located in India and the same is compliance with all the statutory/regulatory obligations. For other personal information collected as part of our outsourcing services being provided to our 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.

E. Collection of Certain Non-Personal Information

We automatically track certain information about you based upon your behaviour on our Platform. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users and improve our services. This information is compiled and analysed on an aggregated basis.

Cookies: Cookies are small data files that a Website stores on Your computer. We will use cookies on our Website similar to other lending websites / apps and online marketplace websites / apps. Use of this information helps Us identify You in order to make our Website more user friendly. Most browsers will permit You to decline cookies but if You choose to do this it might affect service on some parts of Our Website.

If you choose to make a purchase through the Platform, we collect information about your buying behaviour. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Website, we collect such information into a file specific to you.

PURPOSE OF COLLECTION

We shall use the information collected from you for facilitating the lending and non-lending Services for the following purposes as detailed below. We understand the importance of your information and ensure that it is used for the following intended purposes only.

The intended purpose of collecting information provided by you is to:

- a. Establish identity and verify the same;
- b. To facilitate your KYC as per instructions from our Lending Partners;
- c. Troubleshoot problems, monitor, improve and administer our Platform;
- d. Provide our service i.e. facilitating loans to You or providing our value-added services or non-lending services to you.
- e. Design and offer customized products and services offered by our third-party partners;
- f. Analyse how the Platform is used, diagnose service or technical problems and maintain security;
- g. Send communications notifications, information regarding the products or services requested by You or process queries and applications that You have made on the Platform;
- h. Measure consumer interest and satisfaction in our products and services and manage Our relationship with You;
- i. Marketing and promotional purposes including sending you promotional SMS, Email and WhatsApp and inform you about online and offline offers, products, services, and updates;
- j. Conduct data analysis in order to improve the Services / Products provided to the User;
- k. Use the User information in order to comply with country laws and regulations;
- l. Use the User information in other ways permitted by law to enable You to take financial services from our lending partners.
- m. Resolve disputes and detect and protect us against suspicious or illegal activity, fraud and other criminal activity;
- n. Customize your experience and enforce our terms and conditions.

We will use and retain only such basic personal information such as your name, contact information, address details and such other information which are necessary for the provision of Services and for such periods as necessary to provide You the Services on the Platform, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

DISCLOSURE TO THIRD PARTIES

We will share Your information only with our third parties including our regulated financial partners, vendors etc for facilitation of Services on the Platform.

We will share the information only in such manner as described below:

- a. We disclose and share Your information with the financial service providers, banks or NBFCs and our Lending Partners for facilitation of a loan or facility or line of credit or purchase of a product;
- b. We share Your information with our third-party partners in order to conduct data analysis in order to serve You better and provide Services our Platform;
- c. We may disclose Your information, in order to enforce or apply our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of us, our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

- d. We will disclose the data / information provided by a user with other technology partners to track how the user interact with the Platform on our behalf.
- e. We and our affiliates may share Your information with another business entity should we (or our assets) merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. Should such a transaction occur than any business entity (or the new combined entity) receiving any such information from us shall be bound by this Policy with respect to your information.
- f. We will disclose the information to our third-party technology or third-party data source providers;
- g. We will share Your information under a confidentiality agreement with the third parties and restrict use of the said information by third parties only for the purposes detailed herein. We warrant that there will be no unauthorised disclosure of your information shared with third parties.
- h. We shall disclose your KYC journey or any data with respect to the same to the relevant regulatory authorities as a part of our statutory audit process. Please note that your Aadhaar number shall never be disclosed.

We may share your personal information with the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities if we are acting under any duty, request or order as part of our legal obligations and in accordance to the applicable laws. By accepting this Privacy Policy, you hereby provide your consent to disclose your personal information for such regulatory disclosure.

Any disclosure to third parties is subject to the following:

- a. If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request, we shall not seek your explicit consent however we shall reasonably endeavour to notify the same to you accordingly as the case may be as stated under subclause 3;
- b. We shall take your express consent in the event we share your personal data with third parties;
- c. We shall share your information with third-party only on a need basis and only for the purpose stated hereunder, as per the applicable laws.
- d. We shall additionally seek express consent through a separate consent for at appropriate stages of data collection, if so required under applicable laws.
- e. Usage of your information by such third parties is subject to their privacy policies. We share limited information with them, strictly to the extent required. We recommend you to have a look at the privacy policies of such third parties.

List of entities with whom your information is shared can be assessed at <https://vinayanafinvest.co.in/#>

DATA RETENTION AND DELETION

We at VIFL promise to protect your personal data from unauthorized access, misuse, and disclosure using the right security measures based on the type of data and how we are processing the same. We retain information about you to provide a seamless experience, to contact you in case of support required and about your account, to detect, mitigate, prevent, and investigate fraudulent or illegal activities during the course of the Services. We retain your data for as long as necessary to provide you with our services. We may also retain and use your basic personal information inter alia as name,

contact number, transactional details and address details as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements which shall always be in accordance with applicable laws. Subject to this section, we may delete your data upon reasonable written request for the same at any stage. However, you may not be able to use our services after deletion.

LINK TO THIRD-PARTY SDK AND OTHER SITES

The App has a link to registered third party SDKs, Application Programming Interface (API) integrations, redirections which collect data on our behalf and data is stored to a secured server. We ensure that our third-party service provider takes extensive security measures in order to protect your personal information against loss, misuse or alteration of the data as required under the applicable laws.

Our third-party service provider employs separation of environments and segregation of duties and have strict role-based access control on a documented, authorized, need-to-use basis. The stored data is protected and stored by application-level encryption. They enforce key management services to limit access to data.

Furthermore, our registered third-party service provider provides hosting security – they use industry-leading anti-virus, anti-malware, intrusion prevention systems, intrusion detection systems, file integrity monitoring, and application control solutions.

We don't allow unauthorized access to your non-public personal contacts or financial transaction SMS data with any third party in relation to Lending Services other than our Lending Partners. However, for Non-Lending Services (Value Added Services), we may allow third parties to access your non-public personal contacts or financial transaction SMS subject to your explicit consent.

Our Platform links to other websites that may collect information about you. We are not responsible for the privacy practices or the content of those linked websites. With this Policy we're only addressing the disclosure and use of data collected by Us. Their data collection practices, and their policies might be different from this Policy and We do not have control over any of their policies neither do we have any liability in this regard.

CHANGES IN THIS PRIVACY POLICY

We reserve the right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. In case, any changes are made in the Privacy Policy, we shall update the same on the Platform. Once posted, those changes are effective immediately, unless stated otherwise. We encourage you to periodically review this page for the latest information on our privacy practices. Continued access or use of the Services constitute Your acceptance of the changes and the amended Privacy Policy.

SECURITY PRECAUTIONS

The Platform intends to protect your information and to maintain its accuracy as confirmed by you. We implement reasonable physical, administrative and technical safeguards to help us protect your information from unauthorized access, use and disclosure. For example, we encrypt all information when we transmit over the internet. We also require that our registered third-party service providers protect such information from unauthorized access, use and disclosure.

Our Platform has stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavour to safeguard and ensure the security of the information

provided by you. We use Secure Sockets Layers (SSL) based encryption, for the transmission of the information, which is currently the required level of encryption in India as per applicable law.

We blend security at multiple steps within our products with the state-of-the-art technology to ensure our systems maintain strong security measures and the overall data and privacy security design allow us to defend our systems ranging from low hanging issue up to sophisticated attacks.

We aim to protect from unauthorized access, alteration, disclosure or destruction of information we hold, including:

- a. We use encryption to keep your data private while in transit;
- b. We offer security feature like an OTP verification to help you protect your account;
- c. We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;
- d. We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
- e. Compliance & Cooperation with Regulations and applicable laws;
- f. We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.
- g. Data transfers;
- h. We ensure that Aadhaar number is not disclosed in any manner.

Data protection laws vary among countries, with some providing more protection than others. We also comply with certain legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000, rules and the amendments made thereunder.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

YOUR RIGHTS

Modifying or rectifying your information: In the event that any Personal Information provided by You is inaccurate, incomplete or outdated then You shall have the right to provide Us with the accurate, complete and up to date data and have Us rectify such data at Our end immediately. We urge You to ensure that You always provide Us with accurate and correct information/data to ensure Your use of Our Services is uninterrupted. In case of modification of Personal Information, Users will be required to furnish supporting documents relating to change in Personal Information for the purpose of verification by the Company.

Your Privacy Controls: You have certain choices regarding the information we collect and how it is used:

- a. Your device may have controls that determine what information we collect. For example, you can modify permissions on your Android/iOS device or Browser to remove any permissions that may have

been given. However, Platform does not provide a guarantee of Services if any such controls are exercised.

b. Delete the App from your device

c. You can also request to remove content from our servers in accordance with Clause C.

Withdrawal/Denial of consent: You acknowledge that the Platform has duly collected the information with your consent and you have the option to not provide such information, or deny consent for use of specific information or revoke the consent already given. However, any withdrawal of such personal information will not be permitted in case any Service availed by You is active. Where a consent has been withdrawn the Platform does not guarantee or be liable for providing such Service. You shall have the following rights pertaining to your information collected by us.

a. Deny Consent: You shall have the right to deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the App delete/ forget the data. However, any such denial will not prejudice the right of the Lending Partners to retain any data in relation to the loans availed by you or by the non-lending service providers in relation to the non-lending services provided to you. Further, in case of a denial of a consent, the Platform does not provide a guarantee or will not be liable towards the continued facilitation of the Services if any such controls are exercised.

b. Withdraw Consent: You may withdraw Your consent to contact You, for the continued collection, use or disclosure of Your information, at any time, or request for deletion of your Login account by raising a request on the Platform or by mailing Us at info@vinayanafinance.com / support@vinayanafinance.com . However, Platform does not provide a guarantee of Services if any such controls are exercised. Further, if You have availed any loan facilities from Our lending partner, the lending partner shall have the right to continue processing Your information till such credit facility has been repaid in full, along with any interest and dues payable and/or for such period as may be allowed under applicable law. However, We, shall not retain Your data and information if it is no longer required by Us and there is no legal requirement to retain the same. Do note that multiple legal bases may exist in parallel, and We may still have to retain certain data and information at any time. Also, the information may still be used for execution of any outstanding or termination activity of any Lending or Non-lending Services.

Report an issue: You have a right to report a security incident to the GRO (detailed mentioned hereinbelow). You are entitled shall be entitled to prevent unauthorised such usage of your information by our personnel/agents by informing us, within 10 days of being informed of the proposed use, that you do not wish to disclose such information. You can also exercise the right at any time by contacting us at info@vinayanafinance.com / support@vinayanafinance.com

Notwithstanding anything to the contrary stated above, the following are specific scenarios listed below which may have consequences to your withdrawal of consent:

1. Marketing and Communication: The consent for this information be withdrawn if You write an email to the email address provided under clause VIII.

2. Information/data deletion may not be implemented for ongoing Services including loan, insurance policy or digital gold products.

GRIEVANCE REDRESSAL

You may make a request for deleting any information from the Platform at any stage upon making a request to Us in the following manner:

Grievance Officer

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below for your reference:

Name: Ms. Priyanka Shukla

Address: 1C/803, Vardan Khand, Sector-1, Gomti Nagar Vistar, Lucknow-226010, U.P.

Email:info@vinayanafinance.com

Contact: [18005320162](tel:18005320162)

Time: Mon - Sat (10:00am - 06:00pm)

//**//**//