

TCPL

TECHFINO CAPITAL PVT LTD

Privacy Policy

PRIVACY POLICY

This Privacy Policy outlines Techfino Capital Private Limited's approach to processing of Data.

At Techfino Capital Private Limited ("TCPL"), we understand the significance of your personal data and process the same in a responsible manner. We urge you to go through this Privacy Policy attentively.

Who is covered by the Privacy Policy?

This policy is applicable to all the existing customers, prospect customers and persons ("User") who visit the office/branch and/or any 'Digital Property' belonging to Techfino Capital Private Limited ("TCPL"), which offer financial services such as Secured & Unsecured loans etc. ("Financial Services"). If you are below 18 years of age, you are expected to view our Digital property under the guidance of a natural parent/legal guardian.

The reference made to (i) 'TCPL' in this Policy would mean and include Techfino Capital Private Limited;

(ii) the term 'Group' would mean and include Group companies, present and future and (iii) the term Digital Property would mean and include website, mobile application and/or any other electronic application.

This Privacy Policy explains about the type of information of the User that TCPL collects, consent, its purpose, salient features etc. as detailed below. We encourage User to read this Privacy Policy regarding the collection, use, and disclosure of information by User from time to time to keep itself updated with the changes & updated that we make to this Policy.

Consent:

By using our website/application/any other electronic application and by availing various products/services from TCPL and Group, User consents to:

1. The terms of this Privacy policy ("Privacy Policy") in addition to the terms of use of mobile application, website, and product documents.
2. Collection of data in connection with availing loan and/or third-party products, facilitated by TCPL.
3. Consent for collection of data in connection with Aadhaar based authentication (Aadhar eKYC) or verification (Aadhar OKYC) facility provided by Unique Identification Authority of India "UIDAI, to check/verify/download/obtain/upload/update KYC details from/with the Central KYC Registry (CERSAI), collection of data from Digilocker provided by MeIT (Ministry of Electronics and Information Technology).
4. Communications relating to marketing & business promotions.
5. Storage of data as per company's policy in addition to regulatory and legal requirements.
6. Consent for E Mandate Registration with eSignature.

Types of information:

This policy is applicable to any types of 'information' that is collected by TCPL:

- a) which is in the nature of personal data of /demographic information of the User provided to TCPL online or offline (i.e. Name, age, date of birth, gender, address, mobile number, email id, PAN number, photograph/image, KYC documents provided by customer or collected from CKYC registry/Aadhar Authority/Digi locker, bank account details, credit scores, GST details, provident fund account details, provided to TCPL through mobile application, website and/or at the time of availing various financial products/services); and
- b) which may or may not be personally identifiable and/or traffic information.

For brevity's sake, the above type of information is collectively referred as "Information" in this Policy.

Sources of Information:

Following are the sources of 'information' collected by TCPL:

- a) from the User, during the product application journey, either online or offline.
- b) from User's browser, mobile application, or mobile device, including cookies etc.,
- c) from its Service providers, dealers, agents/agencies, including the server from the User's browser, mobile app, or mobile device.
- d) Customer Information from Email with the consent of User as part of rendering Financial Services.

Purpose:

Information collected from User may be used by TCPL for the following listed "Purposes":

- a) to provide the User with the services incidental and/or ancillary to the business of TCPL.
- b) to promote the products/services of TCPL.
- c) for evaluation of the existing TCPL products/services, and/or develop products/services.
- d) to render service to User and/or to enhance / improve the Products/Services.
- e) to comply with Applicable Laws / regulations, including credit reporting.
- f) to the extent permitted by the terms of an agreement/ Applicable Law / regulations, share or process User's information in connection with the products / services provided by TCPL, with its Group Companies and/or any third party.
- g) To advertise exclusive offers, promotions, customized search results, and location- based services related to financial products or services.
- h) To automatically populate third-party pages when you click on advertisements within app/website.

Mobile App ("Techfino Capital Private Limited") Permissions:

If User accesses TCPL Mobile Application available on the Google and Apple Play Store, TCPL may require certain device permissions to provide the User certain functionalities within the Techfino Capital Private Limited application in accordance with prevailing law/regulation. This further allows the User a seamless experience on Techfino Capital Private Limited platform.”

“Techfino Capital Private Limited” application uses the below mentioned device level permissions:

Sr. No.	Permission	Description	Permission Availability	Purpose
1	Location	Allows app to access your location	Both Android and iOS	Customer KYC, Fraud Prevention
2	Contacts	Grants access to your contacts		UPI and wallet services
3	Photos	Allows app to access your photos and videos		UPI payments via QR code
4	Camera	Allows app to use your camera		UPI payments via QR code
5	Microphone	Grants access to your microphone		Voice Search
6	Notifications	Allows app to send you notifications		Transactional and promotional communication
7	Files, Media and Storage	Allows app to access your files		Servicing customer requests for products, KYC, allowing customers to download product documents.
8	Phone	Make and manage phone calls	Only Android	SIM Binding for app security, UPI Registration
9	SMS	Send and view SMS		SIM Binding for app security, UPI Registration

Note: Access to permission can be managed by the user directly via device settings.

Cookies:

Cookies are small data files that a website stores on your computer/electronic device. While cookies have unique identification nos., personal information (name, a/c no) SHALL NOT be stored on the cookies. TCPL may:

- i. Temporarily store the mobile number in the cookies, where the User submits the mobile number for a particular session and the same is deleted simultaneous with the session log off;
- ii.
- iii. Use the cookies to store User preferences to ease User’s navigation on the website/electronic/mobile application.

Salient Features:

- a) TCPL respects the privacy of User in accordance with prevailing Law/regulation that governs privacy and always strives to uphold the standards in protecting the same.
- b) Excepting with its Group, its subsidiaries, Service providers, the Information shall not be shared with any external organization unless the same is necessary to enable TCPL to provide you services, meet legal and/or regulatory compliance requirement and/or to enable the completion of a transaction, rendition of services, pursuant to applicable norms/process or pursuant to the terms and conditions applicable to such Information as agreed with TCPL.
- c) TCPL may use the Information to enhance the User's experience and may make subsequent offers to the User about its products/services.

Data Governance and trainings:

At our company, we believe in maintaining transparency with our customers when it comes to data governance policies. As per our data privacy policy, data governance is one of our prime focus areas that help us deliver quality services to our customers. We follow stringent guidelines on data governance, which include factors such as data quality, data minimization, data accuracy, and data accessibility.

We understand that data privacy is a critical concern for our customers, and we ensure that we use the data provided only for specific purposes, adhering to the customer's consent given. Our employees handle customer data ethically and securely. Our employees follow various parameters like data classification, ethical handling of customer data, minimizing data exposure to third parties, and maintaining the confidentiality and privacy of data, among others.

Security

Securing User's Information is of paramount importance to TCPL, and it undertakes the following initiatives to secure privacy of the User's Information:

1. TCPL implements various reasonable management, technical, and administrative measures to safeguard internal information, with sound technical controls to secure the underlying systems.

Service Providers

We may employ third-party service providers and individuals due to the following reasons (not exhaustive):

- To facilitate TCPL's products/ services.
- To provide the service on behalf of TCPL.
- To perform any ancillary service related to products/services of TCPL and/or its Group.
- To assist TCPL in analyzing how the services are used; and
- To assist TCPL and/or its Group in evaluating and improvising the service standards.

User is hereby informed that the third-party service provider/agent/agencies will have access to your Information on a need-to-know basis to assist TCPL in rendering service and are restricted from using the same for any other reason rather than specified during data collection. The third-party service provider is obligated not to disclose or use the Information for any other purpose.

Responsibility of User:

User acknowledges the following:

- a) TCPL and/or its employees /assigns will not contact the User directly for disclosure of any personal information unless required for the above-mentioned Purposes. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting before disclosing any personal data/ information by reaching out to the TCPL's official customer care number accessible on its website before making any disclosure.
- b) TCPL will not be liable / responsible for any breach of privacy owing to User's negligence.
- c) User shall only use the official website/links of TCPL for availing product/services by inputting the domain information on the address bar.
- d) User is completely aware about the potential risk of data/privacy breach and User shall be solely liable for any unauthorized disclosure/ breach of personal information etc. and any direct/ indirect loss suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal data (including but not limited to any Passwords, financial information, account details, etc.) are not shared/stored/made accessible through any physical means with or without User's knowledge (disclosure to any person/third-party etc.) or through any electronic means, by exercising the following precautions/ safety measures:
 - (1) User shall always check if "https" appears in any website's address bar before making any online transaction, to ensure that the webpage is encrypted.
 - (2) User shall avoid using third- party extensions, plug-ins or add-ons on the/your web browser, as it may result in the risk of tracking or stealing of User's personal details.
 - (3) User shall always type the information and not use the auto-fill option on web-browser and mobile apps to prevent the risk of storage of my personal information.
 - (4) User shall NOT access darknet, unauthorized/ suspicious/ malicious website, suspicious online platforms, downloading information from unreliable sources.
 - (5) User shall ensure to disable cookies before accessing any domain/website, to ensure that User's personal information is not tracked by any third-party, unless otherwise consciously permitted by User by accepting the same, for which, User alone will be responsible for the consequences thereof.
 - (6) User shall not respond to any generic emails from an unknown/ unidentified source.
 - (7) User shall check the Privacy Policy of website/ application to know the type of information that may be collected from User and the manner in which it may be processed by the website/ application before accepting/ proceeding/ transaction on any

website/ application.

- (8) User shall always verify and install authentic web/mobile applications from reliable source on User's computer / laptop / tablet / I-Pad / smart phone or any other electronic device.

User shall NOT access any unidentified weblinks, or any other electronic links shared over electronic platform (such as email, SMS, social media, websites).

Data Storage, Retention and Handling:

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

Sr. No.	Kinds of Information	Retention Period
1	KYC Documents (Identity and Address proof, and Loan Application 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	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 (for B2B Loans availed through our dealer/partners)	During the tenure of relationship and 3 Years from closure of the Loan
4	Customer Walk-in Complaint/ Suggestion Register	5 years
5	All necessary records of transactions between the TCPL and the User	5 Years from the date of transaction
6	Deceased Constituents A/c. (Death Certificates, Affidavits, Letters of Disclaimer, Succession Certificate copies, and other related correspondence)	8 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 / improve the products /services of TCPL.

TCPL ensures that access to User data is sufficiently restricted using access controls

Website & links to Other Sites

TCPL's website/ electronic/mobile application may contain links to other sites. If User clicks on a third-party link, User may be directed to that site. It may be noted that such external sites are not operated by TCPL and is beyond the control of TCPL. Therefore, TCPL strongly advises the Users to review the privacy terms/policy of such external websites/electronic applications. TCPL has no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Amendment of Privacy Policy

TCPL may amend/update the Privacy Policy from time to time as required under law. Thus, User is advised to review this page periodically for any changes, since any such changes will be effective immediately after they are updated/posted on this page.

Contact us: In case if you may want to share your concern, we welcome you to easily reach out to us through multiple contact options displayed on [Techfino Capital Pvt Ltd.](#)