

IDF FINANCIAL SERVICES PRIVATE LIMITED

Privacy Policy_ Digital Lending

Approving Authority	Board of Directors
Reviewing Authority	Board of Directors
Policy Making Body	Board of Directors
Effective Date	26/09/2025

Company provides loans through offline mode as well as through websites, digital lending applications (“**DLAs**”) and platforms which are either owned and operated by itself or belong to its Lending Service Providers (“**LSPs**”).

The Privacy Policy summarizes all types of information or data (“**Information**”) that is collected from You by Us, the manner in which it is collected and shared with other third parties as detailed under this Privacy Policy, along with the purpose of collection for each, retention period, the parties that have access and store such Information, and whether provision of such Information is mandatory or optional for availing the services offered by the Company when You use : (a) our website (“**Website**”), (b) DLAs as listed on our Website. (c) other loan sourcing websites and applications in order to avail lending services on which the Company is currently lending or through which it is directly sourcing its customers.

The Company offers the following services to Users via the DLAs / Website:

- (i) Provision/disbursement of various lending products/loans *via* the DLAs as offered by the Company along with other lending partners (“**Digital Lending Services**”); and
 - (ii) Provision of any other services offered through the platforms covered by this Policy
- (collectively, the “**Services**”).

You are advised to read this Privacy Policy along with the terms of use and other Information on website/ applications. Users please take note that any statements made on s website/ applications shall not be construed as an offer or promises for grant of any financial services.

This Privacy Policy has been prepared in compliance with:

- Information Technology Act, 2000 (“**IT Act**”);
- Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021;
- Digital Personal Data Protection Act, 2023 (“**DPDPA**”) and corresponding rules as may be notified from time to time;
- Guidelines on Digital Lending issued by the Reserve Bank of India (RBI), 2022 (“**DLG**”); and
- other applicable acts, regulations and rules which requires the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal Information and all applicable laws, regulations, guidelines provided by applicable regulatory authorities including but not limited to the Reserve Bank of India (“**RBI**”).

USE OF OUR WEBSITE OR SERVICES:

This Privacy Policy is incorporated into and at all times is subject to and is to be read in conjunction with the Terms of Use of the Website.

COLLECTION OF INFORMATION

Information we collect on our Website or from our LSPs, DLAs and Direct Selling Agents (“DSA(s)”)

- 1.1.1. All Information collected by Us for provision of our Services is done through the means of:
 - 1.1.1.1. Information provided by You by filling in forms on the Website;
 - 1.1.1.2. Information provided by You to our LSPs, DLAs and DSAs for availing our Digital Lending Services;
 - 1.1.1.3. Information provided during communications with us (for example, by e-mail or chat) in relation to any Services;
 - 1.1.1.4. Information that You provide when You subscribe to any Services (such as applying for a loan or availing Credit Report Services), search for a loan product, and when You report a problem with any of our Services;
 - 1.1.1.5. Information received by Us from third parties (detailed in Para 2.3 below) based on consents given by You to them in terms of their privacy policies; and
 - 1.1.1.6. Information generated by Your usage of our Website.

This collection of Information is further detailed below.

- 1.1.2. All Information accessed by Us for provision of our Services is collected, processed, stored and shared in a secure manner and to ensure that all the recipients of Your personal information comply with data protection, confidentiality, fidelity and secrecy obligations and duly execute covenants in this regard.
- 1.1.3. We have indicated in this Policy the mandatory and the optional fields of Information required from You. If You exercise the option to not provide any mandatorily required Information, the Company reserves the right to deny You the Service.
- 1.1.4. The personal Information which is collected by Us is collected (a) directly or (b) via our DLAs by taking access of Your mobile phone applications or (c) through third parties, such third party details are disclosed in Para 2.3 below, its purpose (summarized below and as further detailed under “Purpose” section of this Privacy Policy) and whether the Information to be provided by the User is mandatory or optional, for availing any Services, is listed below:

S.No	Information Category	Purpose
1.	Personal and Demographic Information including but not limited to mobile number, email ID, name, gender, date of birth, and address	Customer onboarding, account creation on Platform, facilitating KYC, enabling communication, fraud prevention, assisting NBFC in underwriting, customer support and regulatory compliance
2.	Asset and Income Information	Supporting underwriting and assessment of repayment capacity as per NBFC-approved credit parameters
3.	PAN and Credit Information obtained from Credit Information Companies (CICs)	Facilitating credit assessment, underwriting and regulatory compliance on behalf of NBFC
4.	Device and Technical Information including device identifiers, IP address, log data, app usage information (where Platform is accessed through mobile applications)	Identity verification, fraud prevention, system security and risk assessment

5.	KYC Information including PAN, Aadhaar (masked/tokenised), CKYC or Video KYC data	Identity verification, fraud prevention and compliance with applicable KYC/AML regulations
6.	Geolocation and IP Information	Fraud prevention, identity validation and risk monitoring
7.	Reference Information including name, mobile number and address of references voluntarily provided by the customer	Identity verification, fraud prevention and facilitating repayment follow-ups as permitted by NBFC
8.	SMS metadata and Installed Application Information (excluding personal SMS content; limited to transactional and system-generated messages from authorised senders)	Fraud detection, underwriting support and risk assessment
9.	Transaction Information relating to loan application, disbursement status and repayment status	Legal and regulatory compliance, audit trail and servicing support
10.	Usage Information including Platform interaction data, timestamps and navigation patterns	Enabling, operating and improving Platform services, troubleshooting and analytics
11.	Feedback, grievance and communication records	Customer support, service improvement and grievance redressal
12.	Risk evaluation scores received from payment gateway providers or other authorised service providers	Supporting underwriting and fraud prevention
13.	Employment Information	Supporting underwriting and assessment of repayment capability
14.	Financial Information including income details and bank account information	Supporting underwriting and repayment assessment

1.2. Collection of other Non-Personal Information

1.2.1. We automatically track certain Information (such as browser details, device details and usage details) about You based upon Your behaviour on our Website. 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.

1.2.2. **Cookies:** Cookies are small data files that the Website stores on Your computer. Use of this Information helps Us identify You in order to make our Website more user friendly. **We do not store personal/identity Information in the cookies.** You have the right to reject our access to Cookies since 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.

1.2.3. If You choose to avail any Services through any DLA, we collect Information about the manner in which You are using the DLA. 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 (detailed below) send us correspondence about Your activities or postings on the Website, we collect such Information into a file specific to You.

1.3. Information we collect about You from third parties:

1.3.1. For making the Services available to You, we may collect credit Information in accordance with applicable laws, from the following third parties:

S No.	Third Party	Type of Information Collected
1.	UIDAI	KYC Information
2.	Account Aggregators and Financial Institutions	Bank statement and other Financial Information
3.	Central Registry of Securitisation Asset Reconstruction and Security Interest (“CERSAI”)	CKYC Information
5.	National Securities Depository Limited	PAN verification records
6.	Digilocker	KYC Information
7.	Credit Bureaus	Credit Information
8.	Official GSTIN API stack	GSTIN records and Information

1.3.2. We collect and use this Information on a need basis for the provision of Services and for performing due diligence and verification of Your loan application, as required. Please see paragraph 2.5 below for the consents we obtain from You in relation to the Information sought for obtaining Information from the third parties.

1.4. **Consents sought as part of rendering the Services (through our Website or LSPs/DLAs)**

S No.	Nature of Consent sought	Purpose	Mandatory/Optional
During registration			
1	Your consent that You have read the terms of our Terms of Use/Terms & Conditions and this Privacy Policy	Loan Servicing Consent type: Recurring	Mandatory
2	Consent for sending promotional communication <i>via</i> SMS, Email and WhatsApp	Loan Servicing Consent type: Recurring	Mandatory at the time of registration (can be opted out later)
Loan Servicing and Disbursement (for Digital Lending Services)			
3	Consent for verifying Your PAN on the various PAN databases	Customer KYC Consent type: Recurring	Mandatory

4	Consent for increasing Your credit limit (if required) for availing any loan product on the	Customer KYC Consent type: One-time	Optional
5	Consent for offline submission of Your Aadhaar	Customer KYC (for submission of paperless Aadhaar and provide Your masked Aadhaar and related data) Consent type: One-time	Mandatory (if option availed)
6	Consent to obtain Your CKYC record from CERSAI for CKYC verification	Customer KYC Consent type: Recurring	Mandatory
7	Consent for submission of e-KYC	Customer KYC Consent type: One time	Mandatory
8	Consent for availing insurance services	Loan Servicing Consent type: One time	Mandatory (if insurance option availed)
9	Consent to fetch Your credit report from credit Information bureaus	Underwriting, Loan Servicing Consent type: Recurring	Mandatory
10	Consent for collecting Your financial Information from account aggregators	Underwriting Consent type: Recurring	Optional
11	Consent to access Your Location and IP Information	Customer KYC, Fraud Prevention Consent type: One-time	Mandatory if Services are availed
12	Consent to access Your Microphone	Customer KYC, Fraud Prevention Consent type: One-time	Mandatory
13	Consent to access Your camera (to share photos of necessary documents)	Customer KYC, Fraud Prevention Consent type: One-time	Mandatory

1 4	Consent to fetch Your credit report from credit information bureaus	Provision of Credit Report Service Consent type: Recurring	Mandatory
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2. STORAGE OF PERSONAL INFORMATION:

- 2.1. We ensure that all personal Information collected from You is stored in servers located within India.
- 2.2. No personal Information (other than basic minimal Information viz. name, address, contact details, etc.) belonging to You is collected by our DSAs/DLAs or stored by our LSPs through DLAs for provision of the Services by us. 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).

3. DISCLOSURE TO THIRD PARTIES

- 3.1. We will share Your Information only on a need-basis with the third parties as listed in this Privacy Policy for only purpose of facilitation of Services.
- 3.2. We will share Your Information with the following categories of third parties and for the purposes as described below.

S. No.	Party Type	Purpose of Disclosure
1.	Governmental or Regulatory Authority	If any governmental authority, courts, regulators, or law enforcement officers request or require any Information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process, we may share such required Information with the governmental authority or law enforcement officers.
2.	Debt Collection/Recovery agents (DRAs)	We may engage debt collection/recovery agencies for recovery of any outstanding monies due and payable by You in relation to any loans availed from us (or our co-lending partners, based on instructions received from them).
3.	Service Providers for data analytics, fraud and AML checks	We share Your Information with our third-party partners in order to conduct fraud, anti-money laundering checks for fraud prevention purposes, and data analysis in order to serve You better and provide Digital Lending Services.
4.	UIDAI and Aadhar Database	For fetching Your KYC Information for Identity verification
5.	Pan verification agency	For verification of Your PAN records for the purpose of Identity verification
6.	Banks	For validation of accounts, loan disbursal, E-mandate registration and fetching Your Financial Information
7.	Credit Bureaus	For fetching Your Credit profile for the purpose of underwriting and generation of Credit report (for either Digital Lending Services or Credit Report Services, as required)
8.	Account Aggregators	For fetching Your financial Information for the purpose of underwriting

9.	Third party E-signing providers	For E-signing of Loan documents
10.	Insurance providers	For the purpose of issuing You Insurance Policy
11.	Telecom service providers	For the purpose of communicating with You on SMS and Call
12.	WhatsApp service providers	For the purpose of communicating with You on WhatsApp
13.	Email service providers	For the purpose of communicating with You on Email
14.	Governmental or Regulatory Authority	If any governmental authority, courts, regulators, or law enforcement officers request or require any Information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process, we may share such required Information with the governmental authority or law enforcement officers.
15.	CKYC providers	For the purpose of fetching Your CKYC details for Identity verification

3.3. We will share Your Information under a confidentiality agreement with these third parties and restrict use of the said Information by these third parties specifically for the purposes detailed hereinabove. We warrant that there will be no unauthorised disclosure of Your Information shared with these third parties.

3.4. We may share Your personal Information upon receipt of notice/communication/ order, as a part of Our legal obligations as per applicable laws as may be sought by the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities. By accepting this Privacy Policy, You hereby provide Your consent to disclose Your personal Information for such regulatory disclosure.

3.5. Any disclosure to these third parties is subject to the following:

3.5.1. If we are under a duty to disclose or share Your personal Information 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 this Privacy Policy;

3.5.2. We shall take Your express consent in the event we share Your personal Information with these third parties;

3.5.3. 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;

3.5.4. We shall additionally seek explicit consent at appropriate stages of Information collection, if so required under applicable laws.

3.5.5. Usage of Your Information by such third parties is subject to their privacy policies. We share Information with them to the extent required. We recommend You to go through the privacy policies of such third parties.

4. DATA RETENTION AND DELETION

4.1. We retain Your personal Information in terms of our board approved Record Retention Policy (and in compliance with all regulatory requirements and applicable laws) 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.

4.2. Any Information retained by us will be subject to Your right to withdraw/deny Your consents as per the terms of this Policy and the retention requirements as per applicable laws only.

5. CHANGES IN THIS PRIVACY POLICY:

- 5.1. 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 to the Privacy Policy.

6. SECURITY PRECAUTIONS:

- 6.1. The Company 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 the Information in digital form. We also require that our service providers protect such Information from unauthorized access, use and disclosure.
- 6.2. Our Company has stringent security measures in place to protect the loss, misuse and alteration of Information under control. We endeavor 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.
- 6.3. We further ensure that LSPs engaged by Us comply with all mandatory technology standards, requirements on cybersecurity guidelines stipulated by the RBI and other regulators /agencies, or as may be specified from time to time, for undertaking digital lending services.
- 6.4. In the event of a data breach, we act swiftly to contain and investigate the incident. We report incidents to CERT-IN within 6 (six) hours of discovery and notify regulatory bodies, impacted customers, and other relevant parties as required. Corrective actions are taken to strengthen security, and we provide support to affected customers as necessary.
- 6.5. 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.
- 6.6. We aim to protect from unauthorized access, alteration, disclosure or destruction of Information we hold, including:
- 6.6.1. Encryption of Information to keep Your Information private while in transit;
 - 6.6.2. Security feature like an OTP verification to help You protect Your account;
 - 6.6.3. Review our process of collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;
 - 6.6.4. Restricted access to personal Information to our Staff, representatives, contractors, and agents who need that Information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and suitable disciplinary action taken, in case if they fail to meet these obligations;
 - 6.6.5. Compliance & Cooperation with Regulations and applicable laws;
 - 6.6.6. Periodic review of this Privacy Policy and make sure that we process Your Information in ways that comply with it.
 - 6.6.7. Non-disclosure of Aadhaar number in any manner.
 - 6.6.8. We comply with legal frameworks relating to the transfer of Information as mentioned and required under the IT Act, DPDPA, and corresponding rules and the amendments made thereunder.
 - 6.6.9. On receipt of 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 Information that we cannot resolve with You directly.

- 6.7. The Website has a link to registered third party SDKs, Application Programming Interface (API) integrations, redirections which collect Information on our behalf and Information 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 Information as required under the applicable laws, and employ separation of environments and segregation of duties and have strict role-based access control on a documented, need-to-use basis.
- 6.8. Our third-party service providers employ separation of environments and segregation of duties and have strict role-based access control on a documented, authorized, need-to-use basis. The stored Information is protected and with application-level encryption. They enforce key management services to limit access to Information.
- 6.9. 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.
- 6.10. We don't allow unauthorized access to Your non-public personal contacts or financial transaction SMS Information by any third party in relation to the Services.
- 6.11. The Website 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 are only addressing the disclosure and use of Information collected by Us. Their Information 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.

7. CONSENT

- 7.1. You hereby expressly consent to provide the Information that may be required (and for the purposes as specified herein) in relation to the Services being rendered as per this Privacy Policy.
- 7.2. In addition to the terms provided in this Privacy Policy, You are advised to also read the privacy policies and terms and conditions of our co-lending partners (available on our Website).

8. YOUR RIGHTS

- 8.1. Modifying or rectifying Your Information: In the event that any 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 Information and have Us rectify such Information at Our end immediately. We urge You to ensure that You always provide Us with accurate and correct Information to ensure Your use of Our Services is uninterrupted. In case of modification of Information, Users will be required to furnish supporting documents relating to change in Personal Information for the purpose of verification by the Company.
- 8.2. Your Privacy Controls: You have certain choices regarding the Information we collect and how it is used:
 - 8.2.1. 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, we do not provide a guarantee of Services if any such controls are exercised / access is denied.
 - 8.2.2. Delete the DLAs from Your device.
 - 8.2.3. You can also request to remove content from our servers in accordance with Clause below.
- 8.3. Withdrawal/Denial of consent:

- 8.3.1. You acknowledge that the Platform has duly collected the Information with Your consent and You have the option to not to provide such Information, or deny consent for use of specific Information, restrict disclosure by Us to any third parties, deny retention by Us of any of Your Information, or revoke the consent already given for any of the above, and if required, request deletion/purging of any such Information. However, any withdrawal of such Information will not be permitted in case any Service availed by You is active and such Information is necessary to be retained by Us or Lending Partners/third party partners until the continuation of Service.
- 8.3.2. Where a consent has been withdrawn, we do not guarantee or cannot be liable for providing Services, especially where such Information sought is mandatory for availing such Service. For exercising Your right to withdraw/deny consent as per this clause, please contact us.
- 8.3.3. Please note, any request for withdrawal/denial of consent or deletion of Your Information will be addressed only after all ongoing/active Services have been completed/closed. Further, upon receipt of any request to update the consents provided by You, or a request to delete/forget any of Your Information as per this clause, We will purge/delete Your Information within 30 (thirty) days of receipt of (a) a written request; or (b) at the end of the tenure of all ongoing loans/contracts, whichever is later, unless otherwise required under Applicable Laws. In the absence of any such request, we will retain Your Information as per our internal record retention policy for any duration stipulated under any Applicable Laws. Also, the Information may still be used for execution of any outstanding or termination activity of any Services.
- 8.3.4. 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 Information, restrict disclosure to third parties, data retention, revoke consent already granted to collect any Information and if required, make us delete/ forget the Information. However, any such denial will not prejudice our right to retain any Information in relation to the loans availed by You. Further, in case of a mandatory Information or consent, You have the right to deny the such Information/consent and not proceed ahead on the DLA for the Services.
 - (b) **Withdraw Consent:** You may withdraw Your consent to contact You, for the continued collection, use or disclosure of Your Information, or request for deletion of Your Login account by raising a request on the Website or any DLA or by mailing Us. Further, if You have availed any loan facilities, we shall have the right to continue processing Your Information till such credit facilities have been repaid in full, along with any interest and dues payable and/or for such period as may be allowed under applicable law.
- 8.4. Report an issue: You have a right to report a security breach/incident to the grievance redressal officer (GRO) (details mentioned hereinbelow). You are entitled shall be entitled to prevent unauthorised such usage of Your Information by our personnel/ staff / representative agents by informing us immediately / 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.
- 8.5. Right to nominate: You have the right to nominate any other individual, who can, in the event of Your death or incapacity (due to unsoundness of mind or infirmity of body), exercise Your rights in accordance with the provisions of this Privacy Policy and applicable laws.
- 8.6. Notwithstanding anything to the contrary stated above, the following are specific scenarios listed below which may have consequences to Your withdrawal of consent:
- 8.6.1. **Marketing communication:** The consent for this Information be withdrawn if You write an email to the email address provided under clause below.
 - 8.6.2. **Information deletion** may not be implemented for ongoing Services including loan, insurance policy or digital gold products.

9. PROHIBITED ACTIONS

9.1. While visiting or using our Website, You agree not to, by any means (including hacking, cracking or defacing any portion of the website/applications/portals/platforms) indulge in illegal or unauthorized activities including the following:

9.1.1. Restrict or inhibit any authorized user from using the Website.

9.1.2. Use the Website for unlawful purposes.

9.1.3. Harvest or collect Information about Website's users without their express consent.

9.1.4. "Frame" or "mirror" any part of the Website without our prior authorization.

9.1.5. Engage in spamming or flooding.

9.1.6. Transmit any software or other materials that contain any virus, time bomb, or other harmful or disruptive component.

9.1.7. Remove any copyright, trademark or other proprietary rights notices contained in the application or digital platform.

9.1.8. Use any device, application or process to retrieve, index, "data mine" or in any way reproduce or circumvent the navigational structure or presentation of the application or digital platform.

9.1.9. Permit or help anyone without access to the application or digital platform to use the application or digital platform through Your username and password or otherwise.

9.2. **Contact:**

For any information regarding the Privacy Policy, please contact us, in case You have grievance or relating to collecting receiving, possessing, storing, dealing or handling of personal Information provided by You may contact our Grievance Officer as per grievance redressal policy