

CREDRIGHT FINANCE

Customer Privacy Policy

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1. Who is covered under this Policy

This policy is applicable to the customer and User ("User"/ "You") who avail or intend to avail services from CredRight Finance Private Limited (hereafter CredRight Finance or Company), a Private Limited incorporated under the Companies Act, 2013, having its Registered Office at 8th Floor, Krishe Sapphire, Madhapur, Hyderabad – 500081, Telangana, India and RBI Registered Financial institutions, which are lending partners (hereafter Lending Partners) of CredRight Finance.

We at CredRight Finance, are committed to protecting the privacy and security of your personal data or information. Your privacy is important to us and maintaining your trust is of topmost priority. This Privacy Policy explains how we collect, use, process and disclose information about you. By using our website/app and affiliated services, you consent to the terms of our privacy policy ("Privacy Policy") in addition to our Terms of Use. We encourage you to read this Privacy Policy regarding the collection, usage, and disclosure of your data and information from time to time to keep yourself updated with the changes & updates that we make to this Policy. We recognize the importance of sensitive personal data or information (SDPI) and take reasonable measures to keep such data and information confidential. Information provided by users or customers will only be used/evaluated for the purpose of servicing you with CredRight Finance's or its Lending Partners products or services.

This Privacy Policy describes our privacy practices for our website, www.credrightfinance.com; CredRight Finance Mobile and web applications, and other online applications, products and services that are linked to us and owned and operated by CredRight Finance. This policy has been published in compliance with the Information Technology Act, 2000 read with Information Technology (Intermediaries guidelines) Rules, 2011 and Information Technology (Reasonable Security practices and procedures and sensitive personal data or information) Rules, 2011.

2. Information covered by this Policy

This policy seeks to cover all such data and information that we collect from our users and/or that you provide us as mentioned below:

- a. Any sensitive or personal data and information that the users provide to CredRight Finance by filling in forms, taking pictures of or uploading documents in the mobile app or web for the purpose of loan application or customer service such as name (First Name, Middle name, Last name), KYC documents such as PAN card, Aadhaar, Voter ID etc., date of birth, e-mail address, gender, mobile number, address of house and or shop/office/work, location of the user, bank statements, financial statements like Income Tax Returns, Goods and Services Tax Returns etc. provided to CredRight Finance.
- b. Any information that users provide by directly writing to CredRight Finance or over the telephone.
- c. Any information that users provide to CredRight Finance through its similar online channels including but not limited to chatbot, WhatsApp, SMS, etc.

- d. Any information that may be collected by CredRight Finance from the Credit Bureaus like CIBIL, Experian, CRIF Highmark, Equifax etc. regarding your previous and active loans.
- e. Any information that may be collected by CredRight Finance from the User's browser or mobile app including any information, which may or may not be personally identifiable and/or traffic information and/or any information which may be collected by CredRight Finance, its affiliates/agents/agencies, including our server from the User's browser("Information").
- f. Any information that is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Information for the purposes of this Policy.
- g. Following the services availed by You from time to time, we may explicitly seek additional information including bank details, payment information, credit/debit card details / UPI information and any other governmental identification numbers or documents. You may choose to provide such information if you wish to use the services provided by our App/website/customer service channels for our products on the digital platforms.
- h. CredRight Finance may have a presence on social networking websites including but not limited to LinkedIn, Facebook, Twitter, Instagram, YouTube and blogs which are promotional and business initiatives to connect to a larger group of people. The domain links contained therein may either direct you to our website or request your participation by way of feedback, or suggestions.
- i. We will also maintain a record of the information you provide to us.

3. Information provided by the user and collected through Apps and Website

CredRight Finance and Lending Partners may collect and use technical data and related information, including but not limited to, technical information about your device, system and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other services to you (if any) related to such Mobile Applications.

When you use our Mobile Application, the Mobile Application may automatically collect and store some or all of the following information from your mobile device ("Mobile Device Information"), in addition to the Device Information, including without limitation:

- a. Preferred Language, Name, Business Name, Business-related details, Pin code, Email Mobile number, gender, residential/correspondence address, date of birth, marital status, email address, geo-location or Other contact information;
- b. KYC Documents, Bank Statements, Photographs;
- c. Bank account or other payment instrument details;

d. Any other detail for providing services.

For accessing the above information for the purpose of customer service via your mobile device, the Mobile app will request device permissions such as camera access, and geo- location.

We use Other Information for the purposes including but not limited to troubleshooting connection problems, administering the Website and the Mobile application, analyzing trends in the market, gathering demographic information, to ascertain how our visitors use our Website/Mobile application, including information relating to the frequency of visits to our Website/Mobile application, the average length of visits, pages viewed during a visit, ensuring compliance with the applicable law, cooperating with law enforcement activities, etc. This information is used to improve the Website content and performance.

The Information including but not limited to that the users or customers are likely to provide/we are likely to capture on our digital platforms are categorized below:

Type of Information	Details of the Information Provided/Captured
Location Information	Pin code, Geo tag, Property Information, Address, etc.
Personal Information	Name (Applicant, Co-applicant, Guarantor (If any) – All Parties for the application)
	Email ID & Mobile number of all parties
	Gender & Date of Birth of all parties
	Address of Applicants & Business
Live Picture and Photographs and Videos	Photos and videos of the loan applicants/co-applicant/guarantor, photos of property, business location, residence, etc.
Proof of Identity Or Address	Pan Card/Driving License/Passport/VoterID/AadhaarCard, and/or any other RBI accepted proof of identity/proof of Address/Signature Proof, etc.
Financial Information	Income/Turnover details, details of financial liabilities, BankName, Bank account details, Passbooks/Account statements, etc.
Business Documents	Proof of Business, Business License details including registration documents, GST or ITR filing details, Udyam registration details, Tax Certificates, etc.
Bureau Details	Credit Reports extracted through listed/partnered Bureaus registered under the Credit Information Companies (Regulation) Act, 2005
Technical Information Captured	Type of Device, Browser details, Internet service provider details, Operating System details, Geo tagging, Activities on the web, applications or URL's being used, IP address, Information from the transactional or promotional SMS or emails.

4. Information we collect from Third Parties/shared with third parties

With your consent, we may share your basic personal information to the Lending Partners which in turn may share it with credit bureaus, for example, Transunion CIBIL, CRIF Highmark, Experian, and Equifax which are credit information companies registered under the Credit Information Companies (Regulation) Act, 2005 who are among our partners. You are requested to provide us & the Lending Partners with explicit consent to procure your credit information from the various credit bureaus as mentioned above to check if you meet the loan eligibility.

We and Lending Partners may also use your information for fetching your KYC data from one or more KYC registries. Once you are onboarded, we and Lending Partners may update or share your KYC data with KYC registries such as CKYC and CERSAI, and the transaction details with the credit bureaus mentioned above, which is a regulatory requirement.

CredRight Finance may also employ third-party service providers including Co-lending partners and individuals for the following:

- a. To facilitate our service
- b. To provide the service on our behalf
- c. To perform service-related functions or
- d. To assist us in analyzing how our service is being used

User is hereby informed that the third-party service provider/agent/agencies will have access to your Personal Information on a “need to know” basis to assist CredRight Finance and its Lending Partners in rendering services and are restricted from using the same for any other reason. The third-party service provider is obligated not to disclose or use the information for any other purpose. CredRight Finance and Lending Partner follows Reserve Bank of India’s directions on managing risks and code of conduct in outsourcing of financial services by NBFCs, wherever a third-party partner is involved.

5. How we use the information we collect

Any information provided by you will be used for creating and updating your account and processing your transaction(s) or for any other purposes for which you have granted access to such information to us, based on your interaction with Mobile App/web applications, chatbot, WhatsApp, SMS and CredRight Finance’s official Website as well as our Offline Loan Application and Support Processes.

We may use, store and process the information provided by you to:

- a. Improve the services offered through the Mobile App / web application and other digital platforms
- b. Create and maintain a trusted and safe environment on our website/applications owned by us
- c. Provide, personalize, measure and improve the performance of the products and services offered under our mobile, web applications and other digital platforms.

The information collected through different channels, allows us to collect statistics about our website/app usage and effectiveness, personalize your experience whilst you are on our website/app, as well as customize our interactions with you and enhance the scope of our Services.

Any Information provided by you will be used for the creation of a unique customer ID with CredRight Finance, for availing any further services with us. We may use the information collected to perform internal operations necessary to provide our services, including troubleshooting software bugs and operational problems, conducting data analysis, testing and research and monitoring and analyzing usage and activity trends. We process this personal information for these purposes given our legitimate interest in improving the services.

In order to expand the scope of our services or due to regulatory requirements, we may from time to time, seek additional information from you. Any such collection of additional information and documents shall be subject to an explicit & purpose-specific consent wherever applicable.

We may also contact you, via email/phone for any customer surveys for market research purposes, or marketing communications that we feel might interest you, or send any communication including any content of advertisements or other notifications.

We use the information we collect (including recordings of customer support calls) to assist you when you contact our customer care services to investigate and resolve your queries and monitor and improve our customer support responses. Certain online transactions may involve us calling you. This may also involve online chats. Please be aware that it is our general practice to monitor and, in some cases, record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.

We intend to protect your personal information and maintain its accuracy as confirmed by you. We implement reasonable physical, administrative, and technical safeguards to help us protect your personal information from unauthorized access, use, and disclosure.

We blend security at multiple steps within our products with state-of-the-art technology to ensure our systems maintain strong security measures. We do not ask for any personal and sensitive information like credit card details, Net banking Passwords, CVV of cards, banking transaction OTP's etc.

6. Data Safety/Security

CredRight Finance, Website and apps ensures encryption of collected data in transit and stores it in a secure way. We may share some of this data in compliance with our legal obligations (such as anti-money laundering regulations). Our data retention policies are governed by regulatory bodies.

CredRight Finance intends to protect your personal information and maintain its accuracy as confirmed by you. CredRight Finance continuously strives to implement reasonable physical, administrative, and technical safeguards to protect your personal information from unauthorized access, use, and disclosure. But, remember that no method of transmission, whether in physical form or over the internet, or method of electronic storage is 100% secure and may be subjected to unintentional risks, due to reasons beyond our control.

CredRight Finance reserves the right to disclose information shared by you without your consent (express or implied) and without any liabilities to you when required or permitted by law and we

have a good-faith belief that (i) such action is necessary to comply with an appropriate law enforcement investigation, current judicial proceeding, a court order or legal process served on us or (ii) to conform to the legal requirements, compliance/reporting to administrative and judicial authorities, as may be required (iii) protect and defend the rights or property of the website owners of CredRight Finance, or the users of CredRight Finance, (iv) person(s) or company (ies) who provide certain support services to us, or (v) person(s) or company (ies) who share certain responsibilities/obligations of CredRight Finance and (vi) to third parties/ service partners for providing you services offered by such third parties and service partners. Further, we reserve the right to disclose information shared by you without your consent with entities engaged in providing the credit scores or credit information related services like CIBIL, Highmark, Experian, Equifax etc.

7. Links to Other Sites

Our website may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that such external sites are not operated by us. Therefore, CredRight Finance strongly advises you to review the Privacy Terms of such external websites. CredRight Finance has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services. Under no circumstances shall we be deemed to control or guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, cookies, messages or other materials available on such platforms.

8. Responsibilities of Users

User acknowledges the following:

- a. CredRight Finance and/or its employees/personnel/assigns will not contact the User directly for disclosure of any sensitive and personal data or information unless required for the purpose of providing users with products or services they have expressed interest in. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting you before disclosing any personal and sensitive personal data/information by reaching out to CredRight Finance's nearby branch office or official customer care number published on its website www.CredRightFinance.com before deciding to make any disclosure.
- b. User shall not hold CredRight Finance liable/responsible for any breach of privacy owing to your negligence and hereby waive off from making any claims/demands/compensation against CredRight Finance.
- c. User shall only use the official website/links and mobile app of CredRight Finance for availing products/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 hereby confirms that User shall be solely liable for any unauthorized disclosure/breach of personal/sensitive personal information, etc. and any direct/indirect losses suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal data/sensitive personal data (including but not limited to any passwords, financial information, account details, etc.) are not shared/stored/made accessible

through:

- i. any physical means with or without User's knowledge (disclosure to any
- ii. person/third-party; etc.)
- iii. any electronic means, by exercising the following precautions/safety measures:
- iv. 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;
- v. 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 my personal details;
- vi. User shall always type the information and not use the auto-fill option on web browser to prevent the risk of storage of my personal/sensitive personal information;
- vii. User shall not access darknet, unauthorized/suspicious websites, suspicious online platforms, downloading applications from unreliable sources.
- viii. 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
- ix. by user by accepting the same, for which, User alone will be responsible for the consequences thereof;
- x. User shall not respond to any generic emails from an unknown/unidentified source;
- xi. User shall check the Privacy Policy of the 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;
- xii. User shall always verify and install authentic web/mobile applications from reliable source on User's computer/laptop/tab/iPad/smart phone or any other electronic device;
- xiii. User shall NOT access any unidentified weblinks

We suggest you agree that you shall not engage in any activity of data scraping or data crawling on the Platform and usage of web crawling or web scraping software for accessing the Platform would be considered to be an unauthorised access.

9. Rights of Users

Users have the right to ask CredRight Finance for

- a. Obtain information about processing of their data
- b. Seek correction and erasure of Personal Data for which they can write to contactus@credright.com, use the mobile app to ask for correction or erasure of data or call our contact center at 7386478785. However, if the User has availed a loan from CredRight Finance or its Lending Partners, CredRight Finance cannot delete the data pertaining to loan details and

user KYC till the loan has matured or data which has to be kept for a certain period as per the law or regulator

- c. Nominate another person to exercise rights in the event of death or incapacity
- d. Withdraw their consent at any time during or after the processing of personal data

10. Changes to the Privacy Policy

CredRight Finance may update our Privacy Terms from time to time. Thus, you are advised to review this page periodically for any changes. CredRight Finance will notify you of any changes by posting the new Privacy Terms on this page. These changes are effective immediately after they are posted on this page. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing or availing the Platform for availing the services. Your continued use of the Services following the posting of changes to this Privacy Policy will constitute Your consent and acceptance of those changes.

11. Contact Us

If you have questions, concerns, or suggestions regarding our Privacy Policy, you may get in touch with us through various contact options displayed on <https://www.CredRightFinance.com/>.

In order to effectively address customer grievances, CredRight Finance has introduced multiple channels of communication. A customer can raise a complaint or express their dissatisfaction on the company service through the below channels:

- a. Walk into our Branch and speak to the Branch Manager
- b. Call us on 7386478785 and speak to our customer care agent
- c. Email us at contactus@credright.com
- d. Send us letters to our registered address: The Customer Grievance Redressal Officer, 8th Floor, Krishe Sapphire, Madhapur, Hyderabad – 500081, Telangana, India.

For further details on our Grievance Redressal Policy, please go to <https://www.CredRightFinance.com/grievance-redressal>

12. Customer/User Consent

By accessing our mobile application, Website and other related web pages, User expressly consent to CredRight Finance to collect, maintain, process the information provided, and also disclose the information in accordance with this privacy policy.