

DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED
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DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED	
POLICY	Data Privacy Policy
VERSION	1.0
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PROCESS OWNER	Information Technology

Last updated on November 13, 2024

This document (“**Privacy Policy**”) of Dvara Kshetriya Gramin Financial Services Private Limited (DVARA KGFS) is published by virtue of the legal requirement under the provisions of the The Digital Personal Data Protection Act, 2023, Information Technology Act, 2000 and RBI Guidelines on Digital Lending dated Sep 02, 2022 that require Regulated Entities to publish the rules and regulations, privacy policy and terms for access or usage of their website/mobile app and is primarily governed by Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

Commitment

DVARA KGFS intends to protect the privacy of its users and members on its website and the privacy of the data provided by them to DVARA KGFS from time to time. For the purpose of this Privacy Policy, Website means and includes the website (www.dvarakgfs.com) and applicable mobile application of DVARA KGFS.

The privacy of our Website users, whether you are our former or existing registered user or merely a visitor to our Website, is important to us and we are strongly committed to your right to privacy and to keeping your personal and other information secure. We encourage you to read our privacy statement to understand what types of personally identifiable information we collect and how we use this information.

What type of information does Dvara KGFS.com collect from you?

Personal Information

For the purpose of providing, you our services, we may require you to enrol yourself on our Website and get yourself registered.

1. DVARA KGFS collects details on your name, e-mail address, gender, date of birth, postal address, phone number, a unique login name, password, password validation, income tax details, marital status, family details, business information and other details shared via application form or via email or via any other medium (**Personally Identifiable Information**), in a variety of ways, including but not limited to, when you visit our site. However, users may also choose to visit our site **Anonymously**.
2. DVARA KGFS collects personal information from Users only with their consent and refusal to supply, may prevent them from engaging in certain site related activities.
3. DVARA KGFS may also collect other information specific to provide you service each time such as name, bank statements, KYC documents, personal details, business details, income tax details, marital status, family details and other information via application form or via email or via any other electronic medium or via printed form (**Service Information**). All Personally Identifiable Information and Service Information shall be collectively known as “**Information**”.
4. In addition to the Information made available to us, we may seek your consent and request access to your email account. On receipt of the consent, Dvara KGFS may have a one-time access to the said account for collecting information like bank statement details, and such other financial and

transactional information to process your loan application or provide you products/services. Dvara KGFS's access to the email account(s) is authorized through the email provider's access mechanism. If you permit Dvara KGFS to access your bank statements, Dvara KGFS will securely store bank account details. **You can choose to enable us to access one or more of your email accounts by explicitly consenting to each single account separately. Please note that your consent is purely voluntary.** We only read emails from financial service providers and do not open, read or access any personal e-mails. We hereby confirm that we do not access any other personal information. For the sake of clarity, Dvara KGFS employs automated processes for accessing and analysing information provided by you; where we may need to use our algorithm to access a password-protected document utilizing information provided by you.

5. Additionally, DVARA KGFS collects your other details including but not limited to your feedback, suggestions, views, opinions, etc. shared on our Website (**User Information**) that may be shared/volunteered by you on our discussion forums or other pages of our Website. Such information being in the public domain is available for access to all our Website's users and visitors. You are advised to exercise discretion before you make such details public, as such information is vulnerable to misuse and can be easily misused. DVARA KGFS in this regard fully disclaims any liability (ies) or claim(s), which may arise by use/misuse of User Information shared by you, by any third party or any party not known to DVARA KGFS.
6. Information exchanged by you with DVARA KGFS in the form of written communication, responses to emails, feedback required from you, participation in discussions, etc. is handled with confidentiality.

INFORMATION COLLECTED THROUGH MOBILE APPLICATIONS

DVARA KGFS services are also provided through the Mobile Application. The information collected through Mobile Applications is as mentioned below:

1. Mobile Device Information: We 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. When you use our Mobile Application, the Mobile Application may automatically collect and store some or all of the following information:

1. Your preferred language and country site
2. The manufacturer and model of your mobile device
3. Your mobile operating system
4. The type of mobile internet browsers you are using

How do we use this information: We use this information to facilitate the provision of software updates, product support and other ancillary services.

2. App Usage Data

1. Identifiable information such as your transactions history on the Website/Mobile Application when you sign up on our Mobile Application/Website.
2. 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.
3. Data related to the performance of the Application and other diagnostic data

How do we use this information: We use this information for identifying and resolving any technical glitches that may be identified from such data and also for improving the overall functionality of the Application.

3. SMS Information: We may collect, store and monitor non-personal SMS sent by 6 – digit alphanumeric senders.

How do we use this information: We use SMS information for (i) carrying out your credit assessment (ii) facilitating your loan application journey (iii) improving your app experience through customized loan terms and personalized assistance while onboarding.

4. Location, Camera, Microphone, and Device Storage Access: We may request for your device location, camera, microphone, and device storage for facilitating you and providing services only in accordance with applicable laws.

How do we use this information: We may use your device location information for verifying your address, for the KYC and onboarding process for the services. We may also request camera access to scan and capture the required KYC documents. We may request for microphone and audio permissions to enable a two-way communication between the authorised agents and you for the purpose of performing and completing your KYC. Your audio may be recorded for regulatory purpose. Device Storage Permission may be requested so that you can download and save the documents on your phones and upload the right documents including images for KYC, business registration documents verification etc. for faster approval and disbursal of the loan.

Non-Personal Information

DVARA KGFS also collects certain other information from you on your visit to our Website such as information about your operating system, browser type, the URL of the previous website you visited, list of third-party applications being used by you, your internet service provider and your IP Address (**Non-personal Information**). This information cannot be easily used to personally identify you.

We use Non-personal Information for the purposes including but not limited to troubleshoot connection problems, administer the Website, analyze, trends in the market, gather demographic information, to ascertain how our visitors use our Website, including information relating to the frequency of visits to our Website, average length of visits, pages viewed during a visit, ensuring compliance with the applicable law, co-operating with law enforcement activities, etc. This information is used to improve the Website content and performance. You also agree that DVARA KGFS may gather

usage statistics and usage data from your use of our Website to evaluate your use of our products/services, to improve our products/services, Website content and to ensure that you are complying with the terms of the applicable agreements between you and DVARA KGFS. The statistics and data collected may or may not be aggregated. These statistics contain no information that can distinctly identify you.

We may in future also share this information with third party service providers or third party advertisers to measure the overall effectiveness of our online advertising, content, programming and for other bonafide purpose, as we may desire. By usage of our Website you expressly permit DVARA KGFS to access such information for one or more purposes deemed fit by DVARA KGFS.

Cookies

Similar to other commercial web sites, our Website utilizes standard technology called “Cookies” and Web server logs to collect information about how our Website is used. Cookies are small pieces of information that are stored by your browser on your device’s hard drive. Cookies are only read by the server that places them and are unable to inter alia run programs on your device, plant viruses or harvest your personal information. Cookies allow Web servers to recognize your device each time you return to our Website including the date and time of visits, the pages viewed, time spent at our Website, and the websites visited just before and just after our Website, verify your registration or password information (in case of registered users) during a particular session so that you do not have to input your password multiple times as you navigate the site and suggest products or services that may interest you. This information is collected on an aggregate basis. None of this information is associated with you as an individual.

Most web browsers automatically accept cookies. By changing the options on your web browser or using certain software programs, you can control how and whether cookies will be accepted by your browser. DVARA KGFS understands and supports your right to block any unwanted Internet activity, especially that of unscrupulous websites. However, blocking DVARA KGFS cookies may disable certain features on our Website and may make it impossible for you to use certain services available on our Website.

Session Data

We automatically log generic information about your device’s connection to the Internet, which we call “session data”, that is anonymous and not linked to any personal information. Session data consists of information such as the IP address, operating system, type of browser software being used by you and the activities conducted by you on our Website. An IP address is a number that lets device attached to the Internet, such as our web servers, know where to send data back to the user, such as the pages of the site the user wishes to view. We collect session data because it helps us analyze things such as the items visitors are likely to click on most, the manner in which visitors click preferences on our Website, number of visitors surfing to various pages on the Website, time spent by the visitors on our Website and frequency of their visit. It also helps us diagnose problems with our servers and lets us better

administer our systems. Although such information does not identify any visitor personally, it is possible to determine from an IP address a visitor's Internet Service Provider (ISP), and the approximate geographic location of his or her point of connectivity.

Sharing of Information

DVARA KGFS may share your Information, including the bureau reports, with its service providers, affiliate(s), agents, partners and such other third parties, in accordance with applicable laws, for the purposes of (i) providing the services and to perform the functions on your behalf or on behalf of DVARA KGFS; (ii) marketing new products and services by DVARA KGFS or by any of its affiliate(s), service partners and third parties; or (iii) marketing of services provided by such third parties, affiliates and service partners of DVARA KGFS or (iv) to intimate you for any new products, services, offers and/or promotions being offered by DVARA KGFS or any of its affiliate(s), third partners or service providers. It is hereby expressly declared that third parties / service partners shall be responsible for use of your Information by them.

Third Party Products and Services

There are services and/or products offered by third parties on the Website. If you choose to apply for these third-party products and/or services, then their use of your Information shall be governed by their privacy policies and DVARA KGFS shall not be responsible for their use of your Information and their privacy policies.

DVARA KGFS shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such external website or resource.

Other

We may from time to time add or enhance products/services available on our Website. To the extent these products/services are provided to and used by you, we will use the information you provide in this regard to facilitate the products/service requested. For example, if you email us with a question, we will use your email address, name, nature of the question, etc. to respond to your question. We may also store and publish such information to assist us in making the Website better and easier to use.

Dvara KGFS's use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

Promotional Initiatives

DVARA KGFS may have presence on social networking websites including but not limited to LinkedIn, Facebook, Twitter, 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, suggestions. DVARA KGFS in this regard fully disclaims any liability (ies) or claim(s), which may arise by use/misuse of your feedback, suggestions, views, etc. on any of the aforementioned networking websites or blogs, by any third party whether or not known to DVARA KGFS.

Links to Other Sites

Our Website may contain links to other websites. If you click on a third-party link, you will be directed to that website. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the privacy policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Does DVARA KGFS protect my Personal Information?

DVARA KGFS is committed to protecting the privacy and the confidentiality of your Personal Information. Whenever DVARA KGFS obtains Information from you, our Website uses commercially reasonable efforts and general industry standards to protect it from any unauthorized access or disclosure. DVARA KGFS ensures that your Information is stored in a safe and secure manner, as per applicable laws. DVARA KGFS uses its best endeavours to maintain physical, electronic and procedural safeguards that aim to protect your information against loss, misuse, damage, modification, and unauthorized access or disclosure. Any disclosure of Information to any third party(ies) and/ or service partners for providing any services to you by such third parties and/ or service partners, shall be in accordance with applicable laws and the terms of this Privacy Policy. It is hereby expressly declared that third parties / service partners shall be responsible for use of your Information by them.

How does DVARA KGFS use the information that it collects?

Information shared by you is used by us and/or authorized third parties/service partners/affiliate(s) to support your interaction with us, to offer you services in the best possible manner and to contact you again about other services and products that we and/or authorized third parties/service partners/affiliate(s) offer. By submitting your Information to DVARA KGFS, you expressly acknowledge and consent to DVARA KGFS to use such Information and to process the same in a manner deemed fit by DVARA KGFS and provided in this Privacy Policy, in compliance with applicable laws. This may involve conducting data analysis, research based on reviews about deals, transfer of your Information to third party experts for the purpose of outsourcing services offered to you by DVARA KGFS, transfer your Information to third parties/ service partners for providing you services offered by such third parties and service partners etc.

What security precautions are in place to protect against the loss, misuse, or alteration of your information?

DVARA KGFS makes every reasonable effort to preserve the privacy and confidentiality of your information shared with us. We implement standard measures to protect against unauthorized access to and unlawful interception of Personal Information. However, no Internet website can fully eliminate security risks. DVARA KGFS implements cyber security policy for handling all security breaches in compliance with applicable laws and regulations.

We reserve the right to disclose Information shared by you as required or permitted under applicable 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 DVARA KGFS, or the users of DVARA KGFS, Further, we reserve the right to disclose Information shared by you with credit information companies (CICs).

What is DVARA KGFS policy on retention and destruction of information that it collects?

DVARA KGFS has defined a record retention period for your Information as five (05) years from the date of last processing of your Information. All deletion of Information will happen within a reasonable period {no later than ninety (90) days} after expiry of the retention period. All physical data will be disposed by shredding or otherwise making unreadable confidential records in accordance with applicable laws. All electronic data will be disposed in a responsible manner and in compliance with applicable laws with prior approval from Dvara KGFS's CTO/CISO.

"The extent of instructions on record management as stipulated in the Master Directions/Directions/Guidelines/Guidance issued by Reserve Bank of India, with reference to provisions of Prevention of Money Laundering (Maintenance of Records) Rule, 2005 (PML Rule, 2005) from time to time would be the directing force."

I have more questions about privacy policy

If you have any questions about this Privacy Policy, the practices of this Website, or your dealings with this Website, please contact us at info@dvarakgfs.com

Will DVARA KGFS change privacy policy in the future?

This policy provides a general statement of the ways in which DVARA KGFS aims to protect your information. You may, however, in connection with specific products or services offered by DVARA KGFS, be provided with privacy policies or statements that substitute or supplement this policy. The terms and conditions of this Privacy Policy may be updated, if required under applicable laws and shall be made available on the Website. The revised Privacy Policy will be effective immediately upon posting to our Website unless otherwise mentioned.

This version of the Privacy Policy is effective from date of approval by the Board of the Company. The Privacy Policy shall bind you and it is your sole responsibility to check the same from time to time. You acknowledge that no knowledge of the revised Privacy Policy shall not be a defence in any proceedings with regard to the Privacy Policy.

Your Consent

By accessing our Website and using it on a continued basis, you expressly consent and confirm to DVARA KGFS collecting, maintaining, using, processing and disclosing your Personal Information and other information in accordance with this Privacy Policy. You may reach out to DVARA KGFS on email info@dvarakgfs.com if you wish to revoke the consent provided here including deletion of your Personal Information and DVARA KGFS shall ensure the same. However, once you are onboarded, Information which needs to be stored and/or shared with third parties / service partners /affiliate(s) as

per regulatory and statutory requirements will be retained by DVARA KGFS. Any other data which is not mandatory to be stored and / or transferred will be deleted on your request.

Law and Jurisdiction

The Privacy Policy will be governed by and construed in accordance with the laws of India, and any disputes relating to this Policy shall be subject to the exclusive jurisdiction of the Courts of Chennai, India.

I have a complaint/concern

In accordance with the relevant provisions of the Information Technology Act, 2000 and Rules and RBI Guidelines on Digital Lending dated Sep 02, 2022, made thereunder, the name and contact details of the Grievance Officer who can be contacted with respect to any complaints or concerns including those pertaining to breach of DVARA KGFS's Terms of Use, Privacy Policy and other policies or questions are published as under:

Grievance Redressal Officer: Ms. Rajalakshmi S

Email ID: Rajalakshmi.s@dvarakgfs.com

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The Grievance Officer can be contacted between 10:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays.