

DAVINTA DATA PRIVACY AND STORAGE POLICY

1. OVERVIEW

Davinta Financial Services Private Limited (“**Davinta**”, “**we**”, “**us**” and “**our**”) recognizes the importance of privacy as well as maintaining confidentiality of the User Information (defined below) of its users. This Data Privacy and Storage Policy (“**Privacy Policy**”) is an integral part of the Davinta’s terms of use (“**Terms**”) and is incorporated herein by reference for access and use of the Platform (defined below).

Capitalised terms not defined in this Privacy Policy shall have the meaning ascribed to them in the Terms. This Privacy Policy shall be read in conjunction with the Terms.

This Policy applies to the information Davinta collects through the Platform, or while rendering services to the Users, in e-mail, text and other electronic communications sent through or in connection with its services.

For the purposes of this Privacy Policy, the term “**you**” or “**your**” relates to the individual who accesses, avails or uses any financial products or services of Davinta from its technology platform including (but not limited to) any of its websites such as www.myloans.davinta.com, www.davintafinserv.com, www.loans.davinta.com, www.davinta.com or any other platform owned or operated by Davinta (“**Platform**”).

This Privacy Policy further describes the policies and procedures (including a summary of the relevant security controls) that Davinta follows when collecting, maintaining, using, transmitting or disclosing any User information to third parties.

This Privacy Policy complies with the provisions of the Information Technology Act 2000 (“**IT Act**”) and rules made thereunder from time to time, Reserve Bank of India (“**RBI**”) guidelines and other applicable laws.

You should be aware that the Platform is not intended for, or designed to attract, individuals under the age of 18 (eighteen). We do not collect personally identifiable information from any person that we know to be under the age of 18 (eighteen).

2. INFORMATION COLLECTED

This Policy further describes the types of User information (*as provided below*) that may be collected from you during your access of the Platform.

2.1 User Information. When you sign up on our Platform, we may collect the following categories of User Information, including but not limited to:

2.1.1 any information, documents, or details that relate to you and/or any third party, which indirectly or directly or in combination with other information available with us, can lead to your and/or such third party's identification ("**Personal Information**") which includes without limitation:

- (a) Contact number;
- (b) Name;
- (c) Email address;
- (d) Residential or business address;
- (e) Nationality;
- (f) Photograph;
- (g) Proof of possession of Aadhar or any personal identification proof
- (h) PAN number;
- (i) Bank account information, as may be necessary subject to the nature of the transaction; and
- (j) Financial information provided on the application forms and transaction related data

2.1.2 Employment / business related details, details of your salary / monthly income / revenue / turnover.

2.1.3 Goods and Services Tax details.

2.1.4 When you connect one or more of your accounts with other financial institutions to your Davinta account, we also may collect User information to identify you (*as provided in Para 2.3 below*), or to help verify that you are the true owner of the account(s), before connecting your account(s).

2.2 Information received from your device: When you use your device to connect to Davinta's Platform, we receive information about that device, including IP address, hardware model, operating system, and other technical information about the device. We also use cookies or similar tracking technologies to collect non-personal information such as usage statistics and location to help us provide and improve our services.

2.3 Information collected from your financial institutions: Davinta collects or maintains user information from the financial institutions you use, such as your bank depending on the services you avail from Davinta. . When you link your primary bank account to Davinta's Platform, we may collect several categories of User information, including:

2.3.1 Bank account information, including your bank's name, the account type you use (such as a "checking account" or "savings account"), account number(s), and the institution's routing number;

2.3.2 Information about any balance or transactions in your account; and

2.3.3 Any other Information about the bank account owner(s) provided by the financial institution.

2.4 Information we receive about you from other sources: We may also collect User Information directly from third parties, including our service providers or lending partner. For example, Davinta may collect and maintain User Information from service providers and lending partners in order to verify that you are authorized to use Davinta's Services.

3. PURPOSE OF COLLECTION OF USER INFORMATION

3.1 Collection of User Information for provision of Services.

From time to time, we may request User Information (*as provided in Section 2 above*) for the below-mentioned purposes:

- for provision of personalised services such as informing you of new services;
- grievance redressal purposes;
- Verifying, authenticating and/or updating your Aadhaar number in accordance with the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 solely for the purpose of facilitation of extension of credit facilities and providing know your customer ("KYC") services to you. Collection of your Aadhaar details is not a mandatory requirement for availing our services unless required under any applicable law.
- To enable the provision of credit facility services to you through the Platform or activities and transactions that need to occur during the process of lending, including without limitation, generating and maintaining user profiles, providing personalized features, facilitating collection services, maintaining regular communications with the user concerning transactions the user initiates, such as requesting information or assistance, submitting a loan request, making payments, transferring funds, etc.
- Communicate to you necessary account and product and/or service-related information from time to time.

We will take reasonable steps to ensure that User Information is accurate and complete. The collection and processing of User Information would be within the scope of this Privacy Policy.

3.2 Disclosure to third parties

We may share User Information as part of our data disclosures to third parties on a need to know basis with your prior and explicit consent. This disclosure may be required for us to check your eligibility for, provide you access to, and enable fulfillment of any services being provided to you, or to comply with any legal obligations, to enforce user agreements, to facilitate any marketing and advertising activities, to fetch a copy of your credit information report from credit information companies or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to any services being provided to you. You expressly consent and agree to such disclosures to third parties.

We may disclose user information to third parties such as business partners, law enforcement agencies, insurers, regulatory, government organisations and service providers. Such disclosure may be required for us to provide you access to our products and services; for enhancing your experience; for providing feedback on products; to collect payments from you; to comply with our legal obligations and court orders; to conduct market research or surveys; to enforce our Terms of Use; to facilitate our marketing and advertising activities; to analyze data; for customer service assistance; to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our product and services. We do not disclose user information to third parties for their marketing and advertising purposes without your explicit consent.

We may disclose user information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process. We may disclose user information to law enforcement agencies, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to: enforce our Terms of Use or Privacy Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public.

We and our affiliates may share / sell user information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity, or reorganization, amalgamation, restructuring of business. Should such a transaction occur, the other business entity (or the new combined entity) will be required to follow this Privacy Policy with respect to user information.

The list of the third parties collecting your information can be accessed here [\[hyperlink\]](#). The details of third parties with whom we share user information are provided below:

Name of the third party	Purpose of sharing information
Digio Twentyone Communications Private Limited	PAN Verification, GST Verification, Bank Account Verification
Novel Patterns Private Limited	Bank Statement Verification
Signdesk (Desk Nine Private Limited)	e-sign, e-stamping, e-mandate
Axis Bank Limited	Physical NACH Mandate registration & presentation
Digitap.AI Enterprise Solutions Private Limited	Video-KYC
Allcloud Enterprise Solutions Private Limited	Loan Management
Astute Corporate Services Private Limited	Contact Point Verification

3.3 Collecting Personal Data for online surveys

At times, we conduct online surveys to better understand the needs and profile of our visitors. When we conduct a survey, we will inform you about how we will use the Personal Data prior to your taking the survey. If you do not want to participate in the survey, you may refrain from contributing to it at your own discretion.

3.4 Use of cookies

The Company tracks information provided by visitor's browser, including the website the visitor came from (known as the referring URL), the type of browser used and other information that does not personally identify any visitor of the Platform. This may include installation of cookies and collection of other session data.

3.5 IP address

The Platform uses Internet Protocol (IP) addresses. An IP address is a number assigned to your computer by your Internet service provider so you can access the Internet. Generally, an IP address changes each time you connect to the Internet (it is a "dynamic" address). We use your IP address to report aggregate information on use and to help improve our services.

4. STORAGE OF USER INFORMATION

We operate as per accepted standards to protect all user information submitted to us, both during transmission and once we receive it. We do not collect or store any type of your information other than which you consent to as detailed above and during onboarding to the Davinta platform. We do not collect or store any biometric data from you except where required as per extant statutory guidelines. All user information collected by us is only stored in servers located in India as per extant RBI guidelines and the IT Act and rules made thereunder.

For other User Information collected as part of our outsourcing services being provided to our lending partners, we shall collect such information upon the instructions of the lending partners and thereafter transfer the same to the lending partners upon the completion of your onboarding.

5. PROTECTION OF USER INFORMATION

We take steps designed to protect user information that we collect, store, or disclose. These steps include maintaining information security controls, such as encryption technologies when transferring or storing data, firewalls, and controls over the physical access to our systems. We regularly evaluate the security controls that we use, as well as the controls that our service providers use, for protecting the security and confidentiality of user information. Our goal is to maintain effective security controls, as measured by relevant industry standards and by independent security auditors, for all of the ways that you can use our Services.

As part of our security breach response process, we report all types of unusual security incidents, including successful and unfruitful breach of security incidents, to the RBI within 24 hours in the format provided under the RBI Master Direction on Information Technology Framework for the NBFC Sector dated 8 June 2017. Additionally, we require service providers engaged with us to disclose any security breach or user information leakage to us and the RBI on an immediate basis as per the RBI Directions on Managing Risks and Code of Conduct in Outsourcing of Financial Services by NBFCs dated 9 November 2017.

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

6. DISCLOSURE OF USER INFORMATION

Davinta makes various types of disclosures of User Information to other persons as permitted by law. Our disclosures of user information may apply to some or all the categories of user information that we collect. For example, Davinta may disclose all the types of user information with your financial institution, consistent with your consent or instruction. Davinta also discloses, or reserves the right to disclose the User information for the following purposes:

- (a) With Davinta's service providers or contractors in connection with the services they perform for Davinta;
- (b) With Davinta's lending partner for the credit services rendered through the Platform
- (c) To the extent permitted by law, it will be necessary for us to verify the details you have supplied. Such verification could be done through third party service providers, who shall be bound by the obligation of confidentiality and data protection.
- (d) In connection to all lending done through us, our business partners or our service providers to Credit Information Companies ("CICs") as per extant RBI guidelines including Credit Information Companies (Regulation) Act and rules made thereunder.
- (e) If Davinta believes in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process (such as a court order or subpoena);
- (f) In connection with a change in ownership or control of all or a part of Davinta's business (such as a merger, acquisition, or bankruptcy);
- (g) Between and among Davinta and Davinta's future affiliates (such as subsidiaries or other companies under common control or ownership); or
- (h) To help investigate, prevent or take action regarding unlawful and illegal activities, suspected fraud, potential threat to the safety or security of any person or other user, violations of the Platform's terms of use or to defend against legal claims.
- (i) To our subsidiaries, group companies and/ or affiliates.

We may collect, use, process, or disclose user information in an aggregated or anonymized manner (i.e., in a manner that does not identify you personally) for any purpose permitted under applicable law.

As a convenience to our visitors, the Davinta Platform may contain links to a number of sites that we believe may offer useful information. The policies and procedures we described here may not apply to those sites. We suggest contacting those sites directly for information on their privacy, security, data collection, and distribution policies.

We will process, disclose or share user information only if required to do so by law or in good faith belief that such action is necessary to comply with our contractual obligations, legal requirements or legal process served on us.

7. REVOCATION OF CONSENT

If you change your mind after opting-in, you may withdraw your consent to contact you, or for the continued collection, use or disclosure of user information, restrict disclosure to third parties, or any other consent already granted to us at any time, by mailing us at customercare@davintafinserv.com . Please note that this could impede or restrict our ability to provide our services to you. Further, if you have availed any credit facility from our lending partner, the lending partner shall have the right to continue processing your information till such credit facility has been repaid in full, along with any interest and dues payable and/or for such period as may be allowed under applicable law. Please provide details in the format below as part of your consent revocation request:

First Name	
Last Name	
Country	
State	
City	
Registered Email	
Registered Mobile Number	

8. DATA RETENTION AND DELETION

We retain your data for as long as necessary to provide you with our services. We may also retain and use your basic personal information inter alia as name, contact number, transactional details and address details as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements which shall always be in accordance with applicable laws.

Please note that consent for user information shared with us on a one-time basis for onboarding cannot be revoked after we have shared the same with our third parties to complete the verification and onboarding process.

9. RIGHT TO RECTIFICATION

In the event that user information provided to us is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data at our end immediately. We urge you to ensure that you always provide us with accurate and correct information/data to ensure your use of our services is uninterrupted.

10. GRIEVANCE REDRESSAL

For any grievance or complaint, questions, comments, concerns or feedback in relation to the processing of information or regarding this Privacy Policy, please reach out to us through one of the following modes:

- a. Email. Customer can write to us at customercare@davintafinserv.com.
- b. Telephone for call back. 080-47185381
- c. You can also write to us at our Corporate Address: Urban Vault 1515, 2nd Floor, 19th main, Vanganahalli, Sector 1, HSR Layout, Bengaluru, Karnataka 560102
- d. Website – The Grievance Redressal Mechanism of Davinta can be accessed [here](#).

EFFECTIVE DATE: [15-12-2022]