

Privacy Policy

This Privacy Policy document (“**Privacy Policy**”) is published in accordance with the provisions of Rule 4 (1) of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 which requires the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information.

By visiting the website, www.ganeshleasfin.com (“**Website**”) or the Moneyloji mobile and/or web application (the “**App**”) (collectively, the “**Platform**”) and availing the services provided by us (“**Services**”) you agree to be bound by the terms and conditions of this Privacy Policy.

By mere access to the Platform or any part thereof, you signify your assent to this Privacy Policy and consent to the processing of your personally identifiable information (Personal Information, Sensitive Personal Data or Information) to Ganesh Leasfin Private Limited (“we” or “our” or “us” or “Moneyloji”). This Privacy Policy is incorporated into and subject to the Terms of Use of the Platform.

For the purpose of this Privacy Policy, the users of the Services may be customer/consumers/ buyers/ consumers, or any other persons using Services or accessing our Platform (“user” or “you” or “your”).

If you do not agree to this Policy or any part thereof, please do not use/ access/ download or install the Platform or any part thereof.

COLLECTION OF USER PERSONAL INFORMATION

When you use our Platform, we collect and store your information which is provided by you from time to time by explicitly seeking permissions from YOU to get the required information. Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience and Services. This allows us to provide services and features that meets your needs, and to customize our Platform to make your experience safer and easier and to improve the Services provided by us. More importantly, we collect personal information from you that we consider necessary for achieving the aforementioned purpose.

In general, you can browse the Website or App without telling us who you are or revealing any information about yourself. However, to create an account on the Platform, you must provide us with certain basic information required to provide customized services. The information we collect from you, inter alia, includes:

- a. your full name;
- b. email;
- c. gender;
- d. photograph;
- e. mailing address;
- f. postal code;
- g. family details;
- h. phone number;
- i. Permanent Account Number (PAN);

- j. Information from credit bureaus and customer service providers;

Wherever possible, we indicate the mandatory and the optional fields. You always have the option to not provide any information by choosing not to use a particular service or feature on the Platform. We also collect user account data which includes email address and user public profile information like name, photo, ASID depending on the platform used by You to log-into the App. This information is required as a part of registration process to access our Service and it is also used to auto-populate relevant fields in the course of the interface of the App. We further collect other identifiable information such as your transactions history on the Platform when you set up a free account with us as further detailed below. While you can browse some sections of our Platform without being a registered member as mentioned above, certain activities (such as availing of loans from the third party lenders on the Platform) require registration and for you to provide the above details. The Platform will clearly display the personal information it is collecting from you, and you have the option to not provide such personal information. However, this will limit the services provided to you on the Platform.

Our App also collects mobile number for verification to check the active SIM status on the device, uniquely identify you and prevent frauds and unauthorised access.

COLLECTION OF FINANCIAL SMS INFORMATION

We don't collect, read or store your personal SMS from your inbox.

We collect and transmit only financial SMS sent by 6-digit alphanumeric senders from your inbox which helps us in identifying the various bank accounts that you may be holding, cash flow patterns, description and amount of the transactions undertaken by you as a user to help us perform a credit risk assessment which enables us to determine your risk profile and to provide you with the appropriate credit analysis. This Financial SMS data also includes your historical data and may be collected even when the app is closed or not in use. This process will enable you to take financial facilities from the regulated financial entities available on the Platform.

COLLECTION OF DEVICE LOCATION AND DEVICE INFORMATION

We collect and monitor the information about the location of your device to provide serviceability of your loan application, to reduce risk associated with your loan application and to provide pre-approved customised loan offers. This also helps us to facilitate verification the address, making a better credit risk decision and know your customer (KYC) process.

Information the App collects, and its usage, depends on how you manage your privacy controls on your device. When you install the App, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the App and explicitly seek permissions from You to get the required information from the device. Additionally, we also collect your 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 App functionality. In addition to the above, we also continuously track and collect the data related to the performance of the App and other diagnostic data for identifying and resolving any technical glitches that may be identified from such data and also for improving the overall functionality of the App.

The information we collect and transmit from your device includes the hardware model, build model, RAM, storage, unique device identifiers like IMEI, serial number, SSAID, AAID, SIM information that includes network operator, roaming state, MNC and MCC codes, WIFI information that includes MAC address and mobile network information to uniquely identify the devices and ensure that no unauthorized device acts on your behalf to prevent frauds. This data may be collected even when the app is closed or not in use.

We collect information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behaviour, thereby allowing us to improve our products interaction, quality of services and provide an enhanced customized user experience to you.

COLLECTION OF CONTACT INFORMATION

In the Android app versions 1.4.2 and below and Android app versions 1.4.7 and above, as a part of the loan journey facilitated through Moneyloji, we collect, upload to Moneyloji servers, store and monitor your contact information which includes name, phone number, account type, contact last modified, favourites and other optional data to enable you to autofill the data during the loan application process. This information is also required for the purposes of risk analysis, to enable us to detect credible references, assess your risk profile and further determine your loan eligibility. This data may be collected even when the app is closed or not in use. In our Android app versions 1.4.3 - 1.4.6, we do not collect and monitor contact information which includes the above information.

In the iOS app versions, as a part of the loan journey facilitated through Moneyloji, we collect, upload to Moneyloji servers, store and monitor your contact information which includes name, phone number, account type, contact last modified, favourites and other optional data to enable you to autofill the data during the loan application process. This information is also required for the purposes of risk analysis, to enable us to detect credible references, assess your risk profile and further determine your loan eligibility.

COLLECTION OF INSTALLED APPLICATIONS

We collect and transmit a list of the installed applications' metadata information which includes the application name, package name, installed time, updated time, version name and version code of each installed application on your device to assess your credit worthiness and enrich your profile with pre-approved customized loan offers. This data may be collected even when the app is closed or not in use.

CAMERA

We require camera access to scan and capture the required KYC documents thereby allowing us to auto-fill relevant fields.

As a part of facilitation of the KYC journey, we require access to your camera to enable you to initiate your KYC process. This permission allows us or our authorised agents to perform your Video KYC while also taking screenshots of your original Officially Verified Documents that you present during your Video KYC journey. Video KYC enables you to complete your KYC

digitally, smoothly and efficiently. Your video shall be recorded and retained for regulatory purpose along with the screenshots of original Official Verified Documents.

MICROPHONE

We require microphone permissions to enable a two-way communication between our authorised agent and you for the purpose of performing and completing your Video KYC. Your audio shall be recorded for regulatory purpose.

STORAGE

We require storage permission so that your KYC and other relevant documents can be securely downloaded and saved on your phone. You can then easily upload the correct KYC related documents for faster loan application details filling and disbursal process. This ensures that you are provided with a seamless experience while using the application.

COLLECTION OF OTHER NON-PERSONAL INFORMATION

We automatically track certain information about you based upon your behaviour on our Platform. 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. We also collect your Internet Protocol (IP) address and the URL used by you to connect your computer to the internet, etc. This information may include the URL that you just came from (whether this URL is on our Website or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, and your IP address.

Cookies are small data files that a Website stores on Your computer. We will use cookies on our Website similar to other lending websites / apps and online marketplace websites / apps. Use of this information helps Us identify You in order to make our Website more user friendly. 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.

If you choose to make a purchase through the Platform, we collect information about your buying behaviour.

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 send us correspondence about your activities or postings on the Website, we collect such information into a file specific to you.

USE AND DISCLOSURE OF YOUR PERSONAL AND OTHER INFORMATION

We understand the importance of your information and ensure that it is used for the intended purpose only. We access, store and use the information we collect from you in accordance with the applicable laws to provide our Services, to research and develop new ones subject to the limitations set out in this Privacy Policy.

We use the information to:

- a. resolve disputes;
- b. troubleshoot problems;
- c. help promote a safe service;
- d. analytical analysis;
- e. marketing and promotional purposes including sending you promotional SMS, Email and Whatsapp;
- f. measure consumer interest and satisfaction in our products and services;
- g. inform you about online and offline offers, products, services, and updates;
- h. customize your experience;
- i. detect and protect us against suspicious or illegal activity, fraud and other criminal activity;
- j. enforce our terms and conditions;
- k. improvement of our services and as otherwise described to you at the time of collection

In our efforts to continually improve our product and service offerings, we collect and analyze demographic and profile data about our users' activity on our Platform.

PURPOSE OF COLLECTING INFORMATION

The intended purpose of collecting information provided by you is to:

- a. establish identity and verify the same;
- b. to facilitate your KYC;
- c. monitor, improve and administer our Platform;
- d. provide our service i.e. perform credit profiling for the purpose of facilitating loans to You.
- e. design and offer customized products and services offered by our third party financial partners;
- f. analyse how the Platform is used, diagnose service or technical problems and maintain security;
- g. send communications notifications, information regarding the products or services requested by You or process queries and applications that You have made on the Platform;
- h. manage Our relationship with You and inform You about other products or services We think You might find of some use;
- i. conduct data analysis in order to improve the Services / Products provided to the User;
- j. use the User information in order to comply with country laws and regulations;
- k. conduct KYC for our third party lending partners based on the information shared by the User;
- l. use the User information in other ways permitted by law to enable You to take financial services from our lending partners.

We will use and retain the information for such periods as necessary to provide You the Services on the Platform, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

DISCLOSURE TO THIRD PARTIES

We will share Your information with only our registered third parties including our regulated financial partners for provision of Services on the Website/ App. We will share Your information with third parties only in such manner as described below:

- a. We disclose and share Your information with the financial service providers, banks or NBFCs and our third party partners for facilitation of a loan or facility or line of credit or purchase of a product;
- b. We share Your information with our third party partners in order to conduct data analysis in order to serve You better and provide Services our Platform;
- c. We may disclose Your information, without prior notice, if we are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of Us, Our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- d. We will disclose the data / information provided by a User with other technology partners to track how the User interact with the Platform on Our behalf.
- e. We and our affiliates may share Your information with another business entity should we (or our assets) merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. Should such a transaction occur than any business entity (or the new combined entity) receiving any such information from Us shall be bound by this Policy with respect to your information.
- f. We will disclose the information to our third party technology and credit partners to perform credit checks and credit analysis like Credit Bureaus or third party data source providers;
- g. We will share Your information under a confidentiality agreement with the third parties and restrict use of the said Information by third parties only for the purposes detailed herein. We warrant that there will be no unauthorised disclosure of your information shared with third parties.
- h. By using the Platform, you hereby grant your consent to the Company to share/disclose your Personal Information (i) To the concerned third parties in connection with the Services; and (ii) With the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities, in accordance with applicable laws of India.
- i. We shall disclose your KYC journey or any data with respect to the same to the relevant regulatory authorities as a part of our statutory audit process. Please note that your Aadhaar number shall never be disclosed.

In case we use or disclose your information for any purpose not specified above, we will take your explicit consent.

LINK TO THIRD-PARTY SDK

The App has a link to a registered third party SDK which collects data on our behalf and data is stored to a secured server to perform a credit risk assessment. 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 data.

Our third-party service provider employs separation of environments and segregation of duties and have strict role-based access control on a documented, authorized, need-to-use basis. The stored data is protected and stored by application-level encryption. They enforce key management services to limit access to data.

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.

CHANGES IN THIS PRIVACY POLICY

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 and the amended Privacy Policy.

ACCESSING YOUR INFORMATION / CONTACTING US

At any point of time Users can choose to edit/modify or delete/withdraw any Personal Information shared for use of the Platform. Please note that deleting or withdrawing information may affect the Services we provide to you. In case of modification of Personal Information, Users will be required to furnish supporting documents relating to change in Personal Information for the purpose of verification by the Company.

YOUR PRIVACY CONTROLS

You have certain choices regarding the information we collect and how it is used:

- a. **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can modify permissions on your Android device for access to Camera or Audio permissions.
- b. Delete the App from your device
- c. You can also request to remove content from our servers based on applicable law or by writing to our Grievance Officer.

SECURITY PRECAUTIONS

The Platform 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 over the internet. We also require that our registered third party service providers protect such information from unauthorized access, use and disclosure.

Our Platform has stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavour 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.

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.

We aim to protect from unauthorized access, alteration, disclosure or destruction of information we hold, including:

- a. We use encryption to keep your data private while in transit;
- b. We offer security feature like an OTP verification to help you protect your account;
- c. We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;
- d. We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
- e. Compliance & Cooperation with Regulations and applicable laws;
- f. We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.
- g. Data transfers;
- h. We ensure that Aadhaar number is not disclosed in any manner.

We or our affiliates maintain your information on servers located in India. Data protection laws vary among countries, with some providing more protection than others. We also comply with certain legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000 and rules made thereunder.

When we receive 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 data that we cannot resolve with you directly.

LINKS TO OTHER SITES

Our Platform 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're only addressing the disclosure and use of data collected by Us. If You visit any websites through the links on the Website, please ensure You go through the privacy policies of each of those websites. Their data 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.

YOUR CONSENT

By using the Platform and by providing your information, you consent to the collection, sharing, disclosure and usage of the information that you disclose on the Platform in accordance with this Privacy Policy.

If we decide to change our Privacy Policy, we will post those changes on this page so to make you aware of the information we collect, how we use it, and under what circumstances we share and disclose it.

By using the Platform and by providing your information, you consent to the collection, transmission, sharing, disclosure and usage of the information that you disclose on the Platform in accordance with this Privacy Policy.

GRIEVANCE OFFICER

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below for your reference:

Mr. Atul Kumar

Contact: 0124-4284901

Email: atul@moneyloji.com

Address: Ganesh Leasfin Private Limited,
901, 9th Floor DLF City Court,
MG Road Near Sikanderpur Metro Station
Gurgaon Haryana-122002