

## **SAMASTA MICROFINANCE LIMITED**

### **PRIVACY POLICY**

Data by which you are identified is termed as “Personal Data”. Personal Data does not include any information that is freely available or accessible in public domain. Your Privacy is of utmost importance to us and protection of your Personal Data is a key commitment for us.

We are also governed by Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 to maintain the privacy of your Personal Data.

In this policy, the words “we”, “ours” and/or “us” refer to as “Samasta Microfinance Ltd” and “you” and/or “your” refer to our customers.

#### **I. Personal Data**

Personal Data we may collect from you are as under:

1. Personal details (e.g. name, contact details, residential address, date of birth, documents such as identity card / Aadhaar details / PAN / Voter ID / driving license, and/or education details) needed to avail financial services with us and/or avail other services from us.
2. Your bank account details including transaction history, balances, payment details, for effecting transfer of monies through various payment channels provided by us.
3. Financial details (e.g. income, expenses, and/or credit history) needed as part of application request for some of our services.
4. Images of documents/ photos required to avail our services from us
5. Voice recordings of our conversations with our customer care agent with you to address your queries/grievances.
6. Employment details (e.g. occupation, positions held, employment history, salary and/or benefits) as part of our record retention for Central KYC Records Registry (CKYCR) purposes under Prevention of Money Laundering (Maintenance of Records) Rules, 2005
7. Specimen signature(s) for processing/executing of your instructions received by us.
8. Opinions provided by you to us by way of feedback or responses to surveys.

9. Information obtained from your mobile device by way of using our app like device location, communication information including contacts and call logs, device information (including storage, model, mobile network), transactional and promotional SMS/app notifications.

## **II. Storage of Personal Data**

We store and process your Personal Data only in India, in accordance with RBI circular in respect of the Storage of Payment System Data dated 6th April 2018.

Our data is maintained by service provider in India and the service provider maintains backup and disaster recovery systems in India.

## **III. Sharing of your Personal Data**

Any Personal Data that we have access to shall never be shared without your consent.

In various processes / submission of applications / availment of product offerings, we even seek your explicit consent to use / share your Personal Data.

In our business and operational processes, we only share the data on a partial and “need-to-know” basis to designated personnel or partners or service providers.

We will share your data with competent/ legal/statutory/regulatory agencies / authorities or partner’s/service providers acting on our behalf (as the case may be) in following cases:

1. Only for enabling the provision of the financial services availed by you, strictly on a “need to know” basis and subject to applicable laws.
2. As directed or required by legal/regulatory / statutory / governmental authorities under applicable laws/regulations through a legally obligated request.
3. As required by banks/financial institutions to verify, mitigate or prevent fraud or to manage risk or recover funds in accordance with applicable laws/regulations.

## **IV. Usage of Your Personal Data**

We use your Personal Data in our business activities for providing our or our partners’ products/services and to perform, among other actions, the following:

1. To undertake analytics in offering or improving our services and their security and service quality.

2. Verify and process your applications submitted to us for services and/or instructions or requests received from you in respect of these services.
3. To investigate any complaints/claims/disputes.
4. To respond to your queries or feedback submitted by you.
5. Verify your identity for us to provide financial services to you.
6. Carry credit verification, screenings or due diligence checks as lawfully required by us.
7. Undertake financial/regulatory/management reporting, and create and maintain various credit assessment models.
8. Conduct audits
9. For internal record keeping purposes.
10. In order to have selective offers and promotions.

We also use your Personal Data to fulfill the requirements of applicable laws/regulations and/or court orders/regulatory directives received by us.

#### **V. Cleansing of Personal Data:**

1. We retain your Personal Data as long as the purpose for its usage exists, after which the same is disposed off by us except for any record retention required as per Master Direction on Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 (<https://dea.gov.in/sites/default/files/moneylaunderingrule.pdf>).
2. The PMLA (Prevention of Money Laundering Act 2002) guidelines i.e. section 12, sub-clause nos. 3 and 4 ([https://fiuindia.gov.in/files/AML\\_Legislation/PMLA\\_2002/Section%2012%20-%20Obligations-Reporting%20Entity%20to%20maintain%20records.html](https://fiuindia.gov.in/files/AML_Legislation/PMLA_2002/Section%2012%20-%20Obligations-Reporting%20Entity%20to%20maintain%20records.html)) and PPI guidelines -para 6, sub-clause no. 6.3 ([https://rbi.org.in/ScriptS/BS\\_ViewMasDirections.aspx?id=11142](https://rbi.org.in/ScriptS/BS_ViewMasDirections.aspx?id=11142)) require your transaction logs to be stored for a period of up to 10 years post the deletion of an account. In the event of the pendency of any legal/regulatory proceeding or receipt of any legal and/or regulatory direction to that effect, we may be suggested by the law of the land to retain your Personal Data for longer periods.

#### **VI. Cookie Policy**

"Cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser.

We may use cookie and tracking technology depending on the features offered.

No Personal Data will be collected via cookies and other tracking technology; however, if you previously provided Personal Data, cookies may be tied to such information.

## **VII. Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **VIII. Contact us**

You may contact us on any aspect of this policy or for any discrepancies/grievances with respect to your Personal Data, by writing to our Nodal Officer Mr. Prajwal, Information Security Group, Samasta Microfinance Ltd, 418, 1/2A, 4<sup>th</sup> Cross, 6<sup>th</sup> Main, Wilson Garden, Bengaluru, Karnataka 560027.

All disputes in relation to privacy policy shall be adjudicated in the Bangalore, India only

## **IX. Policy Review & Updates**

This policy shall be reviewed by us as and when required and the same may be changed at any point of time. The updated policy can always be found at <http://www.samasta.co.in/>

**WE WILL NOT SELL, DISTRIBUTE OR LEASE YOUR PERSONAL INFORMATION TO THIRD PARTIES UNLESS WE HAVE YOUR PERMISSION OR ARE REQUIRED BY LAW TO DO SO. WE MAY USE YOUR PERSONAL INFORMATION TO SEND YOU PROMOTIONAL INFORMATION ABOUT THIRD PARTIES WHICH WE THINK YOU MAY FIND INTERESTING IF YOU TELL US THAT YOU WISH THIS TO HAPPEN.**

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