



Privacy Policy for Website

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1. Introduction

Capri Global Capital Limited ("CGCL") is committed to providing the best possible experience to its customers and the best possible relationships with employees, shareholders, and suppliers. The policy aims to protect sensitive information and ensure the confidentiality, integrity, and availability of data.

At Capri Global Capital Limited, we hold the privacy rights of our customers and stakeholders in the highest regard. We acknowledge the significance of processing personal data in a lawful and proper manner, as it is essential for sustaining the trust of our customers in our organization.

It is our responsibility to ensure that any personal data that we collect, process, record or use in any way whether it is physical, digital, or other electronic media will have appropriate safeguards in place to comply with our obligations of confidentiality and privacy.

In this regard, we request our customers and stakeholders to kindly read this "Privacy Policy" carefully.

2. Definitions

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where 'control' means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Application** means the software program provided by the Company downloaded by You on any electronic device Company.
- **Country** refers to: India
- **Device** means any device that can access the Service such as a computer, a mobile phone, or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the range of financial products and services offered by the Company to its customers. Additionally, "Service" extends to the use of any applications, websites, or digital platforms ("Application") operated by the Company, through which users may access or avail themselves of the financial services.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- The term '**You**', '**Your**', or '**User**' mean the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

- The terms 'We', 'Us' & 'Our' shall mean the website/domain/append and the Company (collectively referred to as the "Platform"), as the context so requires.

3. Scope and Acceptance of this Privacy Policy

This Policy applies to the personal data and the sensitive personal data that we collect about you for the purposes of providing You with our services. The policy is applicable to all parties availing the services or having business relationship within the capacity of the company. This includes, but is not limited to, customers who avail themselves of financial services, investors, employees, contractors, and any other parties who may possess a business relationship with the Company.

The policy governs the collection, use, disclosure, and protection of personal and financial information provided by these parties during the course of their interaction with the Company, ensuring compliance with applicable legal and regulatory frameworks. It is designed to safeguard the confidentiality and integrity of the data entrusted to the Company by its stakeholders.

- By using this website or by sharing/giving us Your personal data and sensitive personal data, You accept the practices described in this Policy, its contents, and have provided Your informed explicit consent to us collecting, storing, processing, transferring and sharing Your Personal Information with partners, service providers for the purposes set out in this Policy. You are advised to use the service, platform and provide personal or sensitive information only upon having thoroughly read, understood, and agreed to the terms outlined in this Privacy Policy.
- We may change and modify Our Privacy Policy to comply with the Company policy or regulatory guidelines from time to time. We encourage you to regularly review this policy to ensure that you are aware of any changes and how your personal data may be used.

4. Collection and Usage of Personal Data

Information/Data that you provide us for availing of our services made available on our Platforms require registration in order to create an account. The Platform collects basic information required (such as name, mailing address, postal code, job title, family details, employer details, phone/mobile number, Aadhar No., PAN details, employment information, declarations, your description and details of your account, financial information such as bank account etc. or any other personal details that may have been voluntarily provided by customer) to deliver services and assist Us in personally identifying you.

If the information provided by you when you signed up is incorrect or has changed, you can quickly update or delete it, unless we need to keep it for business reasons or legal purposes. Even if you change or delete your information, we might have to keep a record of the old details for a certain time to meet legal, regulatory compliance requirements or for our internal records.

Please be aware that we obtain your explicit consent prior to accessing any information on your mobile device. Our collection and analysis are limited to financial transaction SMS data, which includes the names of the parties involved in the transaction, the transaction description, and the amount, for the sole purpose of conducting a credit risk evaluation.

We do not collect, read, or store any personal SMS data. The information we request is essential for generating a credit score that enables us to determine appropriate credit limits more effectively. You have the **option to withhold the requested information or not to provide that information**; however, that may lead to an inaccurate or unavailable credit score for your application.

We affirm that our policy is to refrain from storing your personal information, with the sole exception of the specific details outlined in Section 4.1 of the Policy. These particulars are essential for the execution of our business operations and may be disclosed to external entities as required. The Application does not store any personal data except some basic information such as the customer's name, address, and contact information, which is necessary for conducting our business activities.

4.1. Data that You provide Us directly

While using Our Service, we may ask You to provide Us with Personally Identifiable Information (PII) that can be used to contact or identify You. Personally identifiable information may include regarding name, addresses, telephone number, email addresses, income, liabilities, passport number, Aadhaar details, PAN details, bank account details including details linked to credit/debit payment instruments, information about your mobile phone, any personal details that may have been voluntarily provided by the customer.

- Personal contact information, including any information allowing us to contact you in person. It would include, but is not limited to, users' KYC details, borrowers'/users' academic information and documents, co-borrowers/users' financial documents, etc.
- Demographic information, including date of birth, age, gender, location. We may also collect the location data, if enabled by you to do so.
- If you are accessing our services using mobile device/browser, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.
- User image, for us to cross check and verify the authenticity of the User and for prevention of fraud.
- Account login information including any information that is required for you to establish a user account with us. (e.g. login ID/ email, username, password and security question/answer).
- Consumer feedback, including information that you share with us about your experience in using our services (e.g. your comments and suggestions, testimonials and other feedback)
- We may collect the Usage data, such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- The data collected, as mentioned above, is solely restricted to the above-mentioned activities and will not be in further used for any other purpose. In case we use the data for any other purpose, explicit consent shall be taken from the customers.

- We will ensure that access to camera, microphone, location or any other facility necessary for the purpose of on-boarding/ KYC requirements and only with the explicit consent of the User.
- We will ensure that all data is stored only in servers located within India, while ensuring compliance with statutory obligations/ regulatory instructions.
- You are provided with a **provision to give or deny consent** for use of specific data, restrict disclosure to third parties, data retention, **revoke consent** already granted to collect personal data and if required, make the App delete/forget the data. In case of withdrawal or modification of your consent or your amendment of any of your choices in this regard, we reserve the option not to provide the services or modify the services provided to you for which such information was sought.

4.2. Information collected while using the Platforms

While using our Application, in order to provide features of our Application, We may collect **(with your prior permission)**:

Information regarding your location, pictures and other information from your Device's camera and photo library

We use this information to provide features of our Service, to improve and customize our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server, or it may be simply stored on your device.

you can enable or disable access to this information at any time, through your Device settings.

- ✓ **SMS Permission:** Our App requests permission to access and read your financial SMS using regular expressions. We do not read any personal SMS. We collect SMS data that is related specifically to financial transactions, such as bank messages, and other financial notifications. This information helps us in:
 - **Fraud Prevention:** Detecting and preventing fraudulent activity by identifying unusual transaction behaviour.
 - **Credit Assessment:** Analysing your transaction patterns to perform personalized credit evaluations under the regulatory framework
- ✓ The data is accessed by our systems and applications only. We will only access those messages that are relevant to this purpose and will not read / store/share irrelevant or personal messages in any form or manner. The permission is voluntary and can be revoked at any time. However, denying access may lead to an inaccurate assessment of the user's credit assessment on the platform.
- ✓ We assure you that:
 - **Non-financial messages** will not be accessed or stored.
 - Your SMS data will be used solely for financial analysis, credit assessments, and fraud prevention purposes.
 - This data will be stored in an encrypted format and can be deleted based on personal request using support.
 - Your messages will be periodically purged every 28 days.

- We comply with all relevant data protection regulations to ensure the confidentiality and security of your data as per Government of India rules.
- ✓ **Phone Permission:** Collect and monitor specific information about your device including your hardware model, operating system and version, unique device identifiers like IMEI and serial number, user profile information and mobile network information to uniquely identify the devices and ensure that unauthorized devices are not able to act on your behalf to prevent frauds.
- ✓ **Location Permission:** App will request permission to capture the user's location for verification, risk analysis and operational purposes. The user's location will enable the App to verify addresses, determine serviceability and expedite the KYC process.

4.3. Usage of your personal data

- To provide and maintain our Service, including to monitor the usage of our Service.
- To manage your Account: to manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with Us through the Service.
- To contact you: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and Your experience.

4.4. Sharing Your personal information

We may share Your personal information in the following situations/scenarios:

- **With Service Providers:** We may share Your personal information with service providers to monitor and analyze the use of our service and to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.

- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **For legal reason:** Respond to any applicable law, regulation, legal process, or enforceable governmental request. We share information about the number and type of requests we receive from governments or regulatory authorities etc. Enforce applicable Terms of Service, including investigation of potential violations. Detect, prevent, or otherwise address fraud, security, or technical issues.

5. Additional Data logged or captured

While we practice the standard logging procedure as defined in the policy, in case of an error/bug is identified while using our service, we gather verbose log data from Your device. The additional data log collected might contain details such as Your device's Internet Protocol (IP) address, the name of Your device, the version of Your operating system, the app's settings at the time of the service usage, as well as the specific time and date of Your service interaction, along with other relevant statistics for assessment and troubleshooting of the event.

6. Use of Information available on Public Forum

For credit and risk assessment and procedure, We might use or access personal information or data available on public forums to understand and assess the risk profile of a customer as part of due diligence (as applicable by regulatory and company policy).

7. Cookies

Cookies are small data files that a website stores on Your computer/electronic device. While cookies have unique identification numbers, Personal information (name, a/c no) is **NOT** stored on the cookies. Company may:

- Temporarily store the mobile number in the cookies, where the User submits the mobile number for a particular session and the same is deleted simultaneous with the session log off
- Use persistent cookies which are permanently placed on User's computer to store non-personal (Browser, ISP, OS, Clickstream information etc.) and profiling information (age, gender, income etc.)
- Use Information stored in the cookies to improve User experience by throwing up relevant content where possible. iv. use the cookies to store User preferences to ease User's navigation on the website/electronic/mobile application.
- Please note that if You decline or delete these cookies, some features of the Application may not work properly.

8. Service Providers

We may employ third-party service providers due to the following reasons (not limited to):

- To facilitate Company's services
- To provide the service on behalf of the Company
- To perform any ancillary service related to services of the Company and/or its Group
- To assist the Company in analysing how the services are used
- To assist the Company and/or its Group in evaluating and improving the service standards

User is hereby informed that the third-party service provider/ agent/ agencies may have access to Your Information on a need-to-know basis to assist the Company in rendering service and are restricted from using the same for any other reason rather than specified during data collection. The third-party service provider is obligated not to disclose or use the Information for any other purpose.

9. Data Security, Retention and Transfer

9.1. Security of Your personal data

- We take reasonable precautions to protect Your personal information, information on the platforms and our customer's information from unauthorized access to or unauthorized alteration, disclosure or destruction of information We hold. In particular:
 - We have implemented adequate technical and operational controls to secure data while processing and sharing Your PII, SPII or any sensitive information (wherever applicable)
 - We provide role-based access to Users who need to login to our systems/ applications
 - We provide identity based authorization to users to login to our platforms and systems.
 - We review our information collection, storage and processing practices, to guard against unauthorized access to systems.
- We permit access to personally identifiable information to our employees, contractors and agents who are subject to strict contractual confidentiality obligations for data processing purposes.
- You would be required to cooperate with the Company in order to ensure the security of the information, and it is recommended that You necessarily choose Your passwords carefully such that no unauthorized access is made by a third party.
- The security of Your Personal Data is important to Us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure or error free. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

9.2. Retention of Your personal data

- The Company will retain Your personal data as deemed necessary to comply with the applicable laws, regulatory guidelines and company policies for the services availed from the Company. We will retain and use Your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain Your data to comply with applicable laws and statutory obligations), resolve disputes, and enforce our legal agreements and policies.
- The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen

the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

9.3. Transfer of Your Personal Data

- Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.
- Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.
- The Company will take all steps necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

10. Your Rights

As per the applicable data protection law, Your principal rights are as follows. Please read this in conjunction with the Policy.

- Right to withdraw consent: You have the option, at any time while availing our Services or otherwise, to withdraw your consent given to Us, for processing your data. In case of withdrawal of Your consent, we reserve the option not to provide the Services for which such information was sought. In case the Services are already availed and then You raise a request to withdraw consent, then we have the right to retain to stop the provision of the Services.
- You have the right to exercise any of the above rights by contacting our Data Protection Officer (DPO). Once we receive Your request and verify the same satisfactorily, we shall proceed with assisting You on your request.

11. Your Responsibilities

- We will not contact the User directly for disclosure of any personal information unless required for the above-mentioned purposes. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting before disclosing any personal data/ information by reaching out to the Capri Global's official customer care number accessible on its website before making any disclosure.
- User will be liable/responsible for any breach of privacy owing to their negligence and ensure that no information should be disclosed to any unauthorized entity.
- User shall only use the official website/ links of Capri Global for availing product/ services by inputting the domain information on the address bar.
- User shall exercise utmost caution to ensure that personal data (including but not limited to any passwords, financial information, account details, etc.) are not shared/ stored/ made accessible through any physical means (disclosure to any person/ third-party etc.) or through any electronic means.

- User should not impersonate another person while providing his/her personal data for a specified purpose.
- Users should not suppress any material information while providing his/her personal data for any document, unique identifier, proof of identity or proof of address issued by the State or any of its instrumentalities
- Users should not register a false or frivolous grievance or complaint with a Data Fiduciary or the Board.
- User should furnish information which is verifiably authentic, while exercising the right to correction or erasure.

12. Compliance

At Capri Global, we are committed to maintain the highest standards of data privacy and protection. To ensure that our practices align with our privacy policy and regulatory requirements, we conduct comprehensive audits (Internal audit as well as third party audits) of our privacy policy compliance on a regular basis.

Our Privacy Policy is an integral part of Capri Global's group-wide risk and compliance management framework, ensuring that personal data is protected in accordance with the standards of privacy and security.

We are committed to maintain the highest standards of data privacy and protection. We recognize the importance of safeguarding our customers' personal information and have implemented a zero-tolerance policy towards any breach of our Data Privacy Policy.

Employees found to have violated our Data Privacy Policy will face disciplinary measures, which may include, but are not limited to, written warnings, suspension, demotion, termination of employment or any other legal action. The severity of the disciplinary action will be commensurate with the nature and severity of the breach.

13. Review of Privacy Policy

We keep our Policy under regular review and may update the same to reflect changes to our information related practices. We encourage You to periodically review this page for the latest information on our privacy practices, your continued use and access of our platform will be taken as acceptance of the updated policy.

13.1. Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, you will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

14. Grievance Redressal

- If you have any questions about data security and data privacy practices followed in the company, you can contact us by visiting this page on our website: <https://www.capri loans.in/contact-us/>

- In case of any grievances as regards misuse or processing of your personal information in a time bound manner, please contact Grievance Redressal Officer.
- The Grievance Officer shall redress your grievances expeditiously not later than one month from the date of receipt of grievance.
- Details of our Nodal Grievance Redressal Officer are as under:

Name – Satish Shimpi

Phone – 022-4354-8204

Email – nodalofficer@capriglobal.in