

PRIVACY POLICY

At Subhlakshmi Finance Private Limited (hereinafter referred to as, “we”, “us”, “Subhlakshmi” etc.), we value your trust and respect your right to privacy. This Privacy Policy provides you with details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. If you do not agree to the terms of this Privacy Policy, please do not further use or access Subhlakshmi website/applications.

1) General

We respect the privacy of everyone who visits this Website. The confidentiality and protection of your sensitive personal information is important to us. This Privacy Policy tells you how we collect and use personal information collected by us. Please read this Privacy Policy before using the Website or submitting any sensitive personal information or data.

This privacy statement is applicable to website and applications (mobile and hybrid, hereinafter referred to “applications”) of Subhlakshmi. This Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, or television or any other media or computer resource to access our Services. It is important that you read the Privacy Policy carefully because whenever you use our website/applications, your Personal Data will be processed (if at all) in accordance with this policy.

Once you have accessed this website and have started to make use of the site, it means that you explicitly agree with all the terms that were described in the Privacy Policy, as well as the other terms and conditions on the website.

Telephone Contact:

- Notwithstanding your registration with ‘do not disturb’ or ‘do no call’ services, by sharing your contact number on the Website you are authorizing Subhlakshmi, its representatives, its partner banks, NBFCs and financial institutions and their representatives, to get in touch with you by giving you a promotional call or through sms, and to offer you their services in addition to the products offered by Subhlakshmi.

Email:

- By sharing your email Id you are authorizing Subhlakshmi, its representatives, its partner banks, NBFCs and financial institutions and their representatives, to get in touch with you through promotional emails and offer you their services in addition to the products offered by Subhlakshmi.

Collection of Information:

- Subhlakshmi, its officers, employees and agents (if appointed) are required to collect certain information (which may include sensitive personal information) from you to assist us in our relationship with you.

- You understand that during the course of using this website you may be providing Subhlakshmi and its affiliates, agents, vendors or partner NBFCs, such information about myself that may constitute as “sensitive personal information” as defined by the Information Technology Act, 2000 and the Information Technology Act (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information), Rules, 2011, and you hereby provide your consent for use of such sensitive personal information in such manner as has been provided in the Privacy Policy ([insert hyperlink](#)), by the Company, its affiliates, agents, vendors or partner NBFC’s.
- If you are unable to provide the information we need we may not be able to provide you with the product or service, you have requested. The types of information collected can include:

2) Collection of Information

Personal Information

- a) At times we may request that you supply us with personal information. Generally this information is requested when you want us to provide you with information or a service. We may gather the following information including:
- Loan Amount Requested
 - Name
 - Mobile Number
 - Email Address
 - Aadhaar No.
 - PAN No.
 - Date of birth
 - Residence Address
 - Residence Pincode
 - Residence Ownership Status
 - Partner / Director Details
 - Office Address
 - Office Pincode
 - Office Ownership Status
 - Company Name
 - Constitution Type
 - Business Type
 - Entity Type
 - Industry
 - No. of years in business
 - Business Turnover
 - Business Profit After Tax
 - Existing EMI Obligation
 - ITR filed or not for the current year
 - ITR filed or not for the last year
 - Social Data from Facebook, LinkedIn, Google
 - Banking Data collected through Perfios
 - Balance Sheet for last 2 years (if applicable)

- Profit & Loss statements for last 2 years (if applicable)
 - Income Tax Returns for the last 2 years
 - VAT Receipts
 - ID proofs (Passport, PAN, Election / Voter ID card, Driving License, Aadhaar Card, Government ID Card)
 - Address Proofs (Passport, PAN, Election / Voter ID card, Driving License, Aadhaar Card, Government ID Card, Lease Agreement, Property Tax Receipts, Utility Bills)
 - Mobile Data including but not limited to Transactional SMSes and location related information
 - IP address, a unique identifier for your computer, cellular phones, tablets or such other device (“Devices”)
 - Information which relates to your financial affairs, business, employment, income or assets
 - Address of place where your documents may be collected
 - Information regarding your background from social media and other social platforms
 - Information collected and/or disclosed at the time of personal discussions with our credit team/underwriters or documents collection agents.
 - Information which would help Subhlakshmi determine your eligibility to avail the products and services offered
 - Information which helps Subhlakshmi process applications made by you for particular products and services such as bank statement, income tax returns, pay slip, loan co-applicant’s personal information (if applicable)
 - Any personal information you may provide to us during any telephonic conversation or e-mail communication with our representatives or during document collection by our representative
 - Any other information that Subhlakshmi is required to collect.
- b) Information that is freely available in the public domain or accessible under the Right to Information Act, 2005 or any other law will not be regarded as personal information or sensitive personal data or information.

Non-personal information

- a) At this Website, information sent by your web browser, may be automatically collected. This information typically includes the domain name (the site after the @ in your e-mail address). It may also contain your user name (the name before the @ in your e-mail address). Other examples of information collected by our server include the Internet Protocol (IP) address used to connect the visitor’s computer to the Internet, operating system and platform, the average time spent on our Website, pages viewed, information searched for, access times, Websites or applications visited before and after a visitor visits our Website, and other relevant statistics. The amount of information sent depends on the settings you have on your web browser. Please refer to your browser if you want to learn what information it sends;
- b) All such information will be used to assist us in providing an effective service on this Website. We may from time to time supply the owners or operators of third party websites from which it is possible to link to our Website with information relating to the number of users linking to our Website from such third party websites;

- c) We also use the information which we automatically receive from your web browser to see which pages you visit within our Website, which websites you visited before coming to ours, and where you go after you leave. This is helpful to understand how our visitors use this Website. We use this information in the aggregate to measure the use of our Website and to administer and improve our Website. This statistical data is interpreted by the Company in its continuing effort to present the Website content that visitors are seeking in a format they find most helpful;
- d) When you use a Device to access our Website, we may access, collect, monitor, store on your Device, and/or remotely store one or more “device identifiers.” Device identifiers are small data files or similar data structures stored on or associated with your Device, which uniquely identify your Device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device’s operating system or other software, or data sent to the device by us; and
- e) A device identifier may deliver information to us or to a third party partner about how you browse and use the service and may help us or others provide reports or personalized content and ads. Some features of the Website may not function properly if use or availability of device identifiers is impaired or disabled.

3) Use of your information

- a) We collect and use your personal information in order:
 - (i) to provide information or interactive services through this Website to your e-mail address;
 - (ii) to respond to the queries and/or process requests submitted by you and sharing your information with banks, financial institutions and other third parties, in relation to any of our services provided to you or any other information sought by you;
 - (iii) to contact you in relation to any of our services offered on our Website;
 - (iv) to process applications submitted by you through the online or offline process available on this Website, to avail any of the services provided by us;
 - (v) to improve our business operations and to communicate about our products, services, and businesses;
 - (vi) to provide information regarding our services and this Website, to your e-mail address or, where you wish it to be sent by post, to your name and postal address, to seek your feedback or to contact you in relation to those services offered on our Website; and
 - (vii) to process your requests on the Website and any possible later claims, to meet out our obligations in relation to any agreement you have with us, to resolve problems in relation to any services supplied to you, to create products or services that may compliment your needs.
- b) By using this Website for the purpose, you are voluntarily releasing information to us. Your e-mail address will be used by the Company to respond to you.
- c) In addition, we may have collected similar information from you in the past. By entering this Website you are consenting to the terms of our information Privacy Policy and to our continued use of previously collected information. By submitting your personal information to us, you

will be treated as having given your permission for the processing and using of your personal data as set out in this policy.

- d) We may also send you other information about us, our Website, our newsletters, our products, sales promotions, our other Website and applications, SMS and e-mail alerts, anything relating to other companies in our group or our business partners. If you would prefer not to receive any of this additional information you may click the “unsubscribe” link in any email that we send to you or by sending an email at it@subhlakshmi.in.

Kindly note that unsubscribing from one medium does not automatically lead to unsubscription from the other. We endeavor that within 15 working days of receipt of your instruction, to cease to send you information as requested. If your instruction is unclear we may contact you for further information.

- e) All the information provided to Subhlakshmi by you, including sensitive personal information, is voluntary. You understand that we may use certain information of yours, which has been designated as ‘sensitive personal data or information’, (a) for the purpose of providing you the Services, (b) for commercial purposes and in an aggregated or non- personally identifiable form for research, statistical analysis and business intelligence purposes, for (c) for sale or transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. Subhlakshmi also reserves the right to use the information provided by or about the end-user for the following purposes:
 - (i) Contacting the users for offering new products or services;
 - (ii) Contacting the users for taking product and service feedback;
 - (iii) Analyzing software usage patterns for improving product design and utility;
 - (iv) Publishing such information on the Website, including but not limited to, by way of testimonials, etc.; and
 - (v) Analyzing anonymized practice information for commercial use.
- (vi) In addition to the terms of this Privacy Policy, this section applies to all users registered with Subhlakshmi:
- (vii) As part of the registration as well as the loan application creation and submission process that is available to the users on the Website, certain information, including sensitive personal data or information is collected from the users with their consent and may be shared with our partner banks & NBFCs and other financial institutions;
- (viii) All the statements in this Privacy Policy apply to all users, and all users are therefore required to read and understand this policy set out herein prior to submitting any sensitive personal data or information to Subhlakshmi, failing which they are required to leave our Website immediately;
- (ix) Users’ personally identifiable information, which they choose to provide to Subhlakshmi, is used to help the users describe and identify themselves. This information is exclusively owned by Subhlakshmi. Subhlakshmi may use such information for commercial purposes and in an aggregated or non- personally identifiable form for research, statistical analysis, and business intelligence purposes, and may sell or otherwise transfer such research, statistical, or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates;
- (x) Upon consent of the users, their information may be shared with our partner banks, NBFCs, and other financial institutions, when users register on our Website. Our partner

banks, NBFCs, and other financial institutions may use this information to offer the users their products and services;

- (xi) Any personally identifiable information of the users collected through the Website is not generated by Subhlakshmi and is provided to Subhlakshmi by the users who wish to raise loans using the services available on our Website. Subhlakshmi shares this information with its partner banks & NBFCs and other financial institutions on an AS-IS basis making no representation or warranty on the accuracy or completeness of the information. Subhlakshmi will, however, take reasonable steps to ensure the accuracy of the identity of the tutors;
- (xii) Subhlakshmi makes every effort to capture accurate information from the users. However, Subhlakshmi does not undertake any liability for any incorrect or incomplete information provided to its partner banks & NBFCs and other financial institutions;
- (xiii) Subhlakshmi may keep records of electronic communications and telephone calls received and made in relation to the services or other purposes for the purpose of administration of our services, customer support, research and development, and for better listing of Tutors;
- (xiv) All our employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every users' sensitive personal data and information;
- (xv) Subhlakshmi may also disclose or transfer users' personal and other information a user provides, to a third party as part of reorganization or a sale of the assets of Subhlakshmi. Any third party to which Subhlakshmi transfers or sells its assets to will have the right to continue to use the personal and other information that users provide to us, in accordance with the Terms of Use;
- (xvi) To the extent necessary to provide users with the services, Subhlakshmi may provide their personal information to third party contractors who work on behalf of or with Subhlakshmi to provide users with such services, to help Subhlakshmi communicate with users or to maintain the Website. Generally, these contractors do not have any independent right to share this information, however, certain contractors who provide services on the Website, including the providers of online communications services, will have rights to use and disclose the personal information collected in connection with the provision of these Services in accordance with their own privacy policies; and
- (xvii) Subhlakshmi will not sell/share your personally identifiable information with any third party save and except in accordance with the terms of contained herein or in accordance with the Terms of Use of the Website.
- (xviii) When you submit such personal information to us, you represent that you have the lawful right to submit the personal information and agree that you will not submit any information unless you are legally entitled to do so and that such information is true, complete, and accurate. You may not use a false email address or other identifying information, to impersonate any person or entity, or otherwise mislead as to the origin of any content.
- (xix) By agreeing to this privacy policy you hereby provide Subhlakshmi explicit consent to make background checks regarding your credit history and to obtain a credit report and a CIBIL score and/or any other equivalent score from any other credit bureau/agency that the Company deems fit.

4) Commitment to Information Security

- We take appropriate measures to ensure that your information disclosed to us is kept secure, accurate, and up to date. This site has reasonable security measures in place to protect the loss, misuse, and alteration of the information under our control. We utilize firewalls, SSL encryption technologies, and secured server and authentication procedures for security purposes for our website.
- Unauthorised attempts to upload or change information (or otherwise cause damage to this Website) are strictly prohibited. However, we assume no liability for any disclosure of information due to any errors in transmission, unauthorised third party access to our website and databases or other acts of third parties, or acts or omissions beyond our reasonable control. In the event Subhlakshmi becomes aware of any security breach, we will notify you as soon as possible and take appropriate action to the best of our ability to remedy such a breach.

5) Links to Third-Party Websites

- This Website contains links to sites outside www.subhlakshmi.in. The Company is not responsible for the privacy practices, the content, the authentic nature or safety of such other websites; and
- Our Website links to third party sites which we do not operate or endorse. These websites may use cookies and collect your personal or non-personal information in accordance with their own privacy policies. This Privacy Policy does not apply to third-party websites and we are not responsible in any manner for third party websites.

6) Sharing your information with third parties

- We may pass your Personal Information including your name and address on to a third party in order to deliver the services you have requested for;
- We may also share your data with our affiliates or agents or vendors or partner banks, NBFCs, and other financial institutions, providing services through the Website. You further authorise the affiliates or agents or vendors to use this information to provide services to you, directly or indirectly;
- We may also use your data in order to manage this Website, enable you to subsequently access parts of this Website, detect any fraud or abuses, send you information relevant to the Website or our services, and in case we have any queries;
- We may disclose your information to service providers under contract who help with our business operations and services offered on the Website (such as, but not limited to, document collection services, user verification service providers, user credit rating agencies, etc.);
- We may also disclose your information to respond to legal requirements, enforce our policies, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with the applicable laws and regulations;
- We may also share your information with law enforcement, governmental agencies, or authorized third-parties, in response to a verified request relating to a criminal investigation

or alleged illegal activity or any other activity that may expose us, you, or any other stakeholder of the company to legal liability. We may also disclose your information if: (i) required to do so under any law for time being in force, or required to do so under any order, decree or award passed by any Court, Tribunal or any statutory authority; (ii) trying to protect against the occurrence of, or prevent actual or potential, any fraud, hacking, malware attack or unauthorized transactions or for investigating any of the aforesaid activity which has already taken place;

- We may also share your information with other business entities, should we undergo any corporate restructuring including any plan to merge with or be acquired by that business entity or start a joint venture. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your information);
- You must only submit to us or our agent or the Website information which is accurate and not misleading and you must inform us of any changes; and
- Under no circumstances do we rent, trade, or share your personal information that we have collected with any other company for their marketing purposes without your consent. We reserve the right to communicate your personal information to any third party that makes a legally-compliant request for its disclosure.

7) How long do we keep your information?

We will only keep your information for as long as (a) we are either required to by law, (b) as is relevant for the purposes for which it was collected, or (c) in the good-faith belief that such action is necessary to protect and defend the rights, property, or safety of Subhlakshmi, its users, or the public.

8) Cookies and Other Tracking Technologies

Some of our Web pages utilize "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect data about Web site activity. Some cookies and other technologies may serve to recall Personal Data previously indicated by a Web user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original user ID and password to gain access to certain parts of the Web site. Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our site/application is accessed. Our use of cookies and other tracking technologies allows us to improve our website/applications and your Web experience. We may also analyse information that does not contain Personal Data for trends and statistics.

9) Children's and Minor's Privacy

Subhlakshmi strongly encourages parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent

minors from disclosing their name, address, and other personally identifiable information online without parental permission.

10) Security and Confidentiality

Subhlakshmi makes sure at all times to implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of your Personal Data as the same is of vital importance to Subhlakshmi. At Subhlakshmi, we are strongly committed to protecting the personal and financial information that you submit to us. Subhlakshmi shall ensure to safeguard the security and confidentiality of any data you share with us. Any of your personally identifiable data obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your Personal Data, Subhlakshmi cannot warrant the security of any data you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your Personal Data is done at your own risk. Lastly, you are requested to help us protect your data privacy by maintaining the secrecy of the username and password you use for any of our Services.

11) Intellectual Property Rights

Please note that Subhlakshmi retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all information provided on or via this web site (including all texts, graphics and logos).

12) Disclaimer

Subhlakshmi shall not be liable for any loss or damage sustained by reason of any disclosure (inadvertent or otherwise) of any information concerning the user's account and / or information relating to or regarding online transactions using credit cards / debit cards and / or their verification process and particulars nor for any error, omission or inaccuracy with respect to any information so disclosed and used whether or not in pursuance of a legal process or otherwise. Subhlakshmi does not store any Credit\ Debit card details. Any other personal and sensitive Personal Data shared by you which is not asked by Subhlakshmi during registration, either mandatorily or optionally; accounts to wilful and intentional furnishing; and Subhlakshmi will not be liable for breach of such information.

13) Changes to this Privacy Policy

We reserve the right, at our discretion, to change, alter, modify, add, or remove portions from this Privacy Policy at any time so you are encouraged to review this Privacy Policy from time to time.

14) Miscellaneous

- All users must always provide accurate and updated information to the website enables you to change or amend your provided information, through your registered account on our system.

- Users can request to ask if we are holding and piece of their personal data or receive a copy of that information, provided that you have given us a viable proof of your identity. In case you are not able to prove your identity, the company reserves the right of refusal to send forward any personal details of our registered users. We will also make sure to respond promptly to all user requests for any personal details that the company holds about the user.
- In case you do not wish to receive updates or notices regarding our business in the future, they are entitled to opting out by altering their preferences from their accounts, or by getting in contact with our customer care representatives through the address mentioned at the end of our Privacy Policy. Your request will always be completed as quickly and fluently as possible. You can opt-out of receiving emails from us by unsubscribing through an email that you will be sent after contacting us as outlined below. Any changes that you make will only affect how your information will be used in the future.

15) **Contacting us**

Questions, comments, and requests regarding this Privacy Policy should be addressed to it@subhlakshmi.in. You may also contact us on 8377808085 (Monday-Saturday, 10 am to 6 pm).

16) **Additional Terms and Conditions**

This Privacy Policy shall be read in conjugation with our Terms of Service and any additional terms that may be displayed by Subhlakshmi on individual webpages, and specific terms made applicable to mobile applications and third-party vendors.