

PRIVACY POLICY

DMI FINANCE PRIVATE LIMITED

SUMMARY OF POLICY:

Policy Name	Privacy Policy
Issue and Effective date	14 February 2025
Periodicity of Review	Annual
Owner / Contact	Information Security Department
Approver	Board of Directors

PRIVACY POLICY

1. APPLICABILITY

- 1.1 DMI Finance Private Limited (“**We**” or “**Us**” or “**Our**” or the “**DMI**”) maintain the website www.dmifinance.in (“**Website**”) and the mobile application by the name of DMI Finance (“**App**”) (collectively, the “**Platform**”). This privacy policy (“**Privacy Policy**”) applies in respect of all personal information (as defined below) collected by us from users, visitors and others (hereinafter referred to as “**the User**” and also indicated by “**you**” or “**your**”) who access or use the Platform, submit any information to us or who avail Services (as defined below) from us, including through any third-party application.
- 1.2 This Privacy Policy explains the manner in which we collect, use, disclose and otherwise process such personal information (defined in detail below). We respect your privacy and therefore limit the collection, processing, storage and sharing of personal information to that which is required and appropriate for the purposes approved by you, or for our legitimate interest or any legal requirement. Further, in addition to this Privacy Policy, we obtain specific and explicit consent as and when practicable or required under applicable law
- 1.3 This Privacy Policy has been prepared in compliance with the provisions of the applicable laws including Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information or Information) Rules, 2011; Guidelines on Digital Lending issued by the Reserve Bank of India (RBI), 2022; Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023; The Digital Personal Data Protection Act, 2023. This Privacy Policy is in addition to applicable law and in case of any contradiction between this Privacy Policy and applicable law, the provisions of applicable law will prevail.
- 1.4 Access to and the use of the Platform and availing of the Services is subject to this Privacy Policy. The services offered by us include, without limitation consumption loans, personal loans, MSME loans, payment services including bill payments, display of credit bureau report fetched from credit bureaus, insurance and fixed deposits through third parties or any other services incidental and / or ancillary to our business / financial services (“**Services**”)
- 1.5 It is important that you read the Privacy Policy carefully because by accessing the Platform or utilizing the Services, you shall be deemed to have agreed to all the terms and conditions of this Privacy Policy and have authorized us to collect, process and share the Personal Information as provided in this Privacy Policy, subject to any applicable law. However, we endeavour, as and when practicable or required by applicable law, to seek specific and explicit consent for collection, processing, storage and sharing of your personal information.
- 1.6 Please note that the use of the Platform and availing of Services may also be subject to other conditions such as Terms & Conditions for Use and Disclaimer, as may be applicable to and available on the Website/Application.
- 1.7 This Privacy Policy seeks to help you understand:

- i. The type of data or information which relates to an identified or identifiable person, including sensitive personal data, (“**Personal Information**”) collected by us;
- ii. The purpose of collection, the manner of collection, storage, and processing of such Personal Information;
- iii. The parties with whom such Personal Information is shared and the manner in which they may process such Personal information;
- iv. Your rights and obligations in respect of such Personal Information.

1.8 In the course of availing the Services or accessing the Platforms, you may also be accessing or may be redirected to websites, platforms or apps of third parties, who may collect Personal Information for their own purposes or for providing you other services. This Privacy Policy does not govern Personal Information collected by any such third-party, even though their website, platform, or application may be linked to the Platforms. While we restrict the manner and extent to which we share your personal information with third parties and provide appropriate safeguards in our contractual arrangements with such third parties, we will not be liable or responsible in any manner for any Personal Information collected and processed by such third parties. We advise that you understand and comply with privacy policies applicable to such third-party websites, platforms or applications.

1.9 Further, any information that is freely available or accessible in public domain or shared by you in interactions with third parties in public platforms (including any part of our Platforms which are for general public interaction or which may be viewed by other Users), or furnished under the Right to Information Act, 2005 or any other law for the time being in force will not be subject to this Privacy Policy.

2. PERSONAL INFORMATION WE COLLECT

2.1 We may collect, store and use Personal Information about you when you visit or use any Platform or query on, apply for, or avail any Services or submit any Personal Information to us, including through third party website or application (even if it does not specify our name as the lender/ service provider). Subject to applicable laws, the Personal Information provided by you may be utilized to procure such further information through independent or third-party sources, as may be needed by us for providing any Services. Aadhaar numbers collected in line with the below shall be kept protected in an encrypted form in Aadhaar Vault and it shall not be disclosed unless the same is required to be disclosed under applicable laws.

2.2 We collect the following Personal Information to the extent required for permitted purposes and do not collect data which is excessive or not required for such purposes:

- **Identification Data:** including, without limitation, name, address, email address, phone number, date of birth and gender;
- **Contact Details:** including, without limitation, residential address, phone / mobile number, email address;
- **Financial Data:** including, without limitation, your occupation and job position, financial information (such as income, income sources, assets, details of debit cards, credit cards, bank account details, bank statement etc.), credit bureau score, credit reports and credit data.

- **KYC Data:** including, without limitation, biometric Information, photograph, selfie, liveness check and voice, details of Aadhaar No., PAN card, passport, utility bills and other documents that you provide for purpose of on-boarding and to verify your identity in terms of know your customer requirements;
- **(SMS):** like sender names, SMS body, received and sent time. This data is used to understand your income and spending patterns which help us in the credit evaluation and facilitating higher limits and faster approval rates. We do not read any personal messages.
- **Device:** specific information about your device including your device model, operating system and version, user profile information to uniquely identify the devices, your device's internet protocol address, browser type and browser version.
- **Location:** Location data with your explicit consent for the purpose of on-boarding and know you customer requirements. Further, as and when requested by you, we may seek to access location with your explicit consent, for providing any specific location-based services as are explicitly sought by you.
- **Storage (Files and Media):** Metadata of files on your device like file names, types, created times, last updated times along with files and documents required for KYC verification and loan agreements. We however do not access storage and media files except any files or media which you may provide specific and limited access to for purpose of uploading the same for any Services.
- **Apps (App Data):** Details of your installed applications on the device to understand usage of applications like VPN, gaming applications and others.
- We collect data about how you interact with our Services. This includes data such as access dates and times, App features or pages viewed, App crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with our Services.
- **Cookies:** We may use various technologies to collect information about your activities on our Platform, including cookies and beacons. Cookies are small files transferred to your device when you visit a website that enables the websites to recognize your browser and capture and remember certain information. Such information may be used to improve your browsing and user experience and analyzing site operations. By using the Website, you consent to the storage of cookies on your devices. You may, however, disable the use of cookies by changing your browser settings.
- **Other Information:** We may seek additional information from you as needed and in accordance with the Applicable Law. You may choose to provide or reject request for such additional information.

Further, to the extent possible and as required by applicable law, we may give you the option to not provide or agree to the collection of specific Personal Information. However, if you choose not to accept the Privacy Policy or not to provide any or all Personal Information as requested, we reserve the right to not provide certain features on the Platform or Services or offer them on terms which may be different (including more onerous or less beneficial) than the terms on which the Services may have otherwise been provided.

3. HOW WE USE PERSONAL INFORMATION

- 3.1 We may use your Personal Information for any other purpose for which you have given your consent ,or to provide various Services to you, or for our internal business purposes, including, but not limited to:
- i. Open, maintain and manage your account with us, including for on-boarding and verification of identity;
 - ii. Respond to your requests for information;

- iii. Provide the Services (including grant of credit, other financial products and any post transaction services) and the terms for such Services;
- iv. Monitor and enforce compliance with the terms of use of the Services, contractual obligations (including payments of any dues to us) and our legal rights;
- v. Curate and optimize our Services for you and provide customized offers or rewards to you;
- vi. Improve our Platform and Services and your experience in respect of the same;
- vii. Undertake marketing, advertising and promotional activities to bring you products and services which may be appropriate or of interest to you. However, we do not sell or transfer your personal data to third parties for their marketing or promotional purposes, without your explicit and specific consent;
- viii. Send you communications, including through SMS, voice call, IVR or any third-party messaging platform in relation to your use of the Services or Platform;
- ix. Administer and ensure the security of our systems and Platform, including any updating, system testing, troubleshooting;
- x. Undertake risk control, investigations and other measures for detection and prevention of fraud, illegal activity, cyber incidents, or other wrongdoing.
- xi. Protect our business and for our other legitimate interests;
- xii. Comply with laws and regulations or requests from government authorities;
- xiii. For business or portfolio transfers, including to evaluate or conduct assignment of receivables, securitization, restructuring, reorganization, mergers and acquisitions, divestiture, sale of all or any of our assets whether as a going concern or otherwise, including in and bankruptcy, dissolution or liquidation proceedings;
- xiv. Otherwise with your consent.

3.2 We may combine your Personal Information available collected through different modes and sources and aggregate any statistics or data that are collected for any of the purposes provided above. However, we are under no obligation to do so.

4. HOW WE SHARE PERSONAL INFORMATION

4.1 By using the Platform and our Services you authorize us to share your Personal Information with third parties as below (to the extent required for any permitted purposes as set out in this Privacy Policy):

- i. **Service Providers:** We may disclose your information to companies that provide services to or on our behalf, including without limitation providing statistical analysis, credit scoring, verification or risk management.
- ii. **Credit Bureaus and other agencies for compliance with Applicable Laws:** We may share your personal details and transaction history in respect of the Services availed from us with credit bureaus and other agencies as may be required by applicable law.
- iii. **Business Partners, including Lending Service Providers:** We may share your Personal Information with our business partners to seek inputs and analysis in respect of the Services or to enable us to provide the Services to you. They may also use your information to provide you with promotional materials, advertisements, offers and other materials.
- iv. **Group Companies:** We may share collected Personal Information with our affiliates whose products and services we believe you may find of interest; in which case we will require that they comply with the terms of this Privacy Policy.
- v. **Statutory and other Disclosures:** We may share your Personal Information with third parties as required for compliance with any applicable laws or directions from government or regulatory

authorities.

- xv. **Third Parties for Business Transfers:** We may share your Personal Information with third parties with whom we are negotiating and/ or concluding any business or portfolio transfers, assignment of receivables, securitization, restructuring, reorganization, mergers and acquisitions, divestiture, sale of all or any of our assets whether as a going concern or otherwise, including in and bankruptcy, dissolution or liquidation proceedings, in order for them to evaluate the feasibility and terms of such arrangements or transfers and to undertake or implement the same.
- xvi. **Other Parties:** We may share your Personal Information with other parties for any other purposes with your consent.

- 4.2 We intend to share your personal information such as your name, registered email address, registered phone number with the third parties as identified and listed in Annexure A. List shall be updated on a quarterly basis.

5. DATA RETENTION

- 5.1 We will retain your Personal Information only to the extent and for the period required by us for the purposes set out in this Privacy Policy or as may be required for compliance with applicable laws, regulatory requirements, or to protect, enforce or establish our legal rights.
- 5.2 You may request us to delete your Personal Information by submitting a request in writing to the contact details provided in Para 13 below (Contact Information and Grievance Redressal). Subject to any compliance with applicable laws, regulatory requirements, or except as required to protect, enforce or establish our legal rights, we will delete such personal information pursuant to receipt of such request. You understand that in case of any such request, your account may be permanently deleted, and you will not be able to reactivate your account. In such case, we may also not undertake any further communication with you. We also reserve the right to cease providing any Services to you and any such discontinuation will be without any liabilities or obligations on us on account of such discontinuation / deactivation.

6. WITHDRAWAL OF CONSENT

- 6.1 You have the right to withdraw your consent for collection or processing of your Personal Information at any time by contacting us as described in the "Contact Us" section on the Website or by switching off/disallowing 'User Consent' through App settings or by writing to the contact details provided in Para 13 below (Contact Information and Grievance Redressal).
- 6.2 If you revoke or withdraw your consent for collection or processing of your Personal Information, then, subject to any compliance with applicable laws, regulatory requirements, or to protect, enforce or establish our legal rights, we will immediately stop actively collecting and processing your Personal Information. However, we reserve the right to recall or stop provision of any Services/ credit facilities (including disabling disbursement of any unavailed sanctioned credit or financial products), as authorization to collect and process such Personal Information is the basis for grant and continuation of such Services.

7. CHANGE OF INFORMATION

- 7.1 You are responsible for providing updated and correct information about yourself to us. We are not responsible for the authenticity, completeness or correctness of the Personal Information supplied by you.
- 7.2 You are entitled to review the Personal Information provided by you to us and ask us in writing to update or correct such Personal Information after providing us reasons as to why you believe such information is inaccurate or incomplete. We will make the necessary corrections or updation on being satisfied that such change is warranted.

8. SECURITY MEASURES

- 8.1 We store your Personal Information only in servers located in India. We use security measures (including physical, electronic and procedural measures) as mandated by applicable law and in accordance with reasonable industry practices to safeguard Personal Information against loss, misuse, damage or modification and unauthorized access or disclosure. However, no system for transmitting or storing information electronically can be completely secure and we cannot guarantee that Personal Information or other communications will always remain secure. Therefore, the use of the Platforms and availing our Services will be at your own risk.
- 8.2 You are also solely responsible for protecting your password and device against unauthorized access.
- 8.3 We assume no liability for any disclosure of information due to errors in transmission, unauthorized third-party acts, or acts or omissions beyond our reasonable control.
- 8.4 If mandated by applicable law, we will notify you if a Personal Information breach occurs and the risk mitigation measures undertaken by us, to the extent required by applicable law.

9. PRIVACY POLICY CHANGES

- 9.1 We may update this Privacy Policy from time to time as we may deem fit. Any such changes will govern our practices in respect of all Personal Information, including that available or collected by us prior to such change. We will make reasonable efforts to update you of any such changes via SMS/ Whatsapp or through notification on the Platforms.

10. NO CONTRACTUAL OBLIGATION

- 10.1 Please note that this Privacy Policy and accessing the Platforms does not entitle you to any Services and does not create any right in your favour or impose any obligation on us, except as expressly set out in this Privacy Policy or otherwise mandated under applicable law.

11. GOVERNING LAW AND JURISDICTION

This Privacy Policy and any matter arising out of it will be subject to laws of India and courts at Delhi will have exclusive jurisdiction in respect of the same.

12. CONTACT INFORMATION AND GRIEVANCE REDRESSAL

- 12.1 In case of any complaints for breach of this Privacy Policy or review of information as provided in this Privacy Policy, you may contact the Grievance Officer as below, between 10:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays:

Grievance Redressal Officer: Ashish Sarin
Address: DMI Finance Private Limited
Express Building, Third Floor,
9-10, Bahadur Shah Zafar Marg,
New Delhi – 110002
Ph. No. - 011 4120 4444i
Email: head.services@dmifinance.in

We will respond to any complaints received by the Grievance Officer within the time period prescribed under applicable law. As provided under applicable law, you will have the right to file a complaint with the Data Protection Board of India as and when it is constituted.

13. DISCLAIMER

WITHOUT LIMITING THE FOREGOING, EVERYTHING ON THE PLATFORMS, THE CONTENT, SERVICES AND MATERIALS IN THE PLATFORM ARE PROVIDED "**AS IS**" AND ON AN "**AS AVAILABLE**". TO THE MAXIMUM EXTENT PERMISSIBLE PURSUANT TO APPLICABLE LAW, WE DISCLAIM ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, IMPLIED WARRANTIES IN RESPECT OF FITNESS FOR A PARTICULAR PURPOSE, ACCURACY, SUFFICIENCY, SUITABILITY, CAPACITY, COMPLETENESS, AVAILABILITY, COMPATIBILITY OF THE SERVICES OR THE PLATFORM OR ANY INFORMATION PROVIDED THEREON. WE DO NOT WARRANT THAT THE SERVICES OR THE PLATFORM WILL BE CONTINUOUSLY AVAILABLE, UNINTERRUPTED OR BE FREE OF ERRORS VIRUSES OR OTHER HARMFUL COMPONENTS, OR THAT DEFECTS WILL BE CORRECTED.

Annexure A

1. Webklipper Technologies Pvt Ltd
(WebEngage)
2. Google
3. Meta Platforms Inc. (Facebook/Instagram)
4. Loylty Rewardz
5. Infobip India Private Limited
6. Moshpit Technologies Pvt Ltd. (Finbox)
7. MCarbon Tech Innovation Private Limited
8. Ignosi Systems Private Limited