

## **APAROKSHA FINANCIAL SERVICES PRIVATE LTD (AFSPL) PRIVACY POLICY**

Effective Date: June 2020

### **SCOPE AND APPLICATION**

The Privacy Policy covers the practices for handling and securing your Personal Information (as enumerated below) by AFSPL. This Privacy Policy is applicable to persons who procure any products or services provided by or facilitated by AFSPL (collectively, the “**Services**”) through our mobile applications, websites, mobile sites, other online channels (collectively, the “**Channel**”) and through other interactions and communications you have with us.

### **COMMITMENT**

AFSPL intends to protect the privacy of its users and members with respect to the Services accessed or availed on the Channel and the privacy of the data provided by them to AFSPL from time to time. We have created this Privacy Policy to demonstrate our commitment to the protection of your Personal Information.

Further, the privacy of our Channel users, whether you are our former or existing registered user or a visitor to our Channel, is important to us and we are strongly committed to your right to privacy and to keeping your personal and other information secure. We encourage you to read this Privacy Policy to understand what types of information we collect and how we use such information.

### **COLLECTION OF INFORMATION**

For the purposes of rendering the Services, the Company may collect your Information from various channels, including, but not limited to, voluntary submission of information from your end in furtherance of the access or usage of the Services, through requests initiated by you through the Services and through communication with third parties.

The minimum age for a user to be registered for the Services is the age of contractual consent under applicable law or 18 years, whichever is lower. We do not knowingly collect any information from any person under the age of 18. If you are below the age of 18, please discontinue the use of the Services and contact us at 18002028313. If you are aware of a user under the age of 18 using our Services, please contact us at 18002028313.

### **CONSENT**

By accessing our Channel, you expressly consent and confirm to AFSPL collecting, maintaining, using, processing and disclosing your Personal Information and other information in accordance with this Privacy Policy and the AFSPL Terms of Use. If you do not agree with this Privacy Policy or the Terms of Use at any time, do not use any of the Services or give us any of your information.

## **WHAT IS THE PERSONAL INFORMATION WE COLLECT FROM YOU, AND HOW DO WE USE IT?**

### **Personal Information**

For the purpose of providing you Services, we require you to enrol yourself on our Channel and get yourself registered. In this process of registration and/or use of the Services, we would collect the information under the following categories, which would constitute Personal Information:

1. To use the Channel and/or avail the Services, you are required to share your name, e-mail address, gender, date of birth, postal address, phone number, profile picture, family details, and other details shared via application form or via email or via any other specified medium.
2. AFSPL may also collect other specific information to render the Services such as bank account or payment instrument details, bank statements, KYC documents, personal details, family details and other information via application form or via email or via any other specified medium .
3. Information exchanged by you with AFSPL in the form of written communication, responses to emails, surveys, feedback required from you, participation in discussions, etc. will also be available for the use of AFSPL.

Please note that AFSPL DOES NOT trade or sell your Personal Information in any manner.

Any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or Personal Information for the purposes of this Privacy Policy.

### **Non-Personal Information**

This information includes the IP address of the device used to connect to AFSPL's Channel along with other information such as browser details, operating system used, the name of the website or application that redirected the visitor to the AFSPL's Channel, etc. Further, when you browse our Channel or receive one of our emails, AFSPL and our affiliated/ authorised entities, use cookies and/or pixel tags to collect information and store your online preferences.

### **Other Information**

We may from time to time add or enhance the Services available on our Channels. To the extent these Services are provided to and used by you, we will use the information you provide to facilitate the Services. For example, if you email us with a question, we will use your email address, name, nature of the question, etc. to respond to your question. We may also store and publish such information to assist us in making the Channel better and easier to use.

### **Indicative modes of collection of Information**

- (a) **When you create an account:** If you want to access our Services, you must create an account with the Company. When you create an account with the Company, we ask for some personal

information, including your email address and date of birth. We will ask permission to access basic information from that email account, such as your name, profile picture, and friend list. We may also access your phone's contact list for the purpose of letting you identify contacts who are existing users of our Services.

- (b) **When you add a profile to your account:** You can enhance your account by filing out a complete profile including professional details including but not limited to your education, interests and skills which help you get found by other people for opportunities. Whenever you add this type of data, we collect it and store it in your account. You agree that information you provide on your profile can be seen by others and used by us as described in this Privacy Policy and our Terms of Use.
- (c) Additionally, you may choose to provide additional information on your profile about the status of your project, project details, timelines for completion of your project, unique features of your project etc. Subject to such additional information, you will be awarded badges by the Company, which will serve as a merit as well as an endorsement and testimony of the skills exhibited by you in completion of your project.
- (d) **When you visit our sites:** We collect industry standard data from everyone who visits our sites, even if they do not have an account with us. This includes log data that automatically records information about your visit, such as your browser type, operating system, the URL of the page that referred you, the different actions you performed, and the IP address you used to access pages on the sites. We use this type of information to provide you with an experience that is relevant to your location based on the IP address, to enhance the sites, to prevent site misuse, and to ensure the site is working properly.
- (e) **Customer Service:** When you contact our customer support services, we may have to access your posts, Groups and other contributions to our Services and collect the information we need to categorize your question, respond to it, and, if applicable, investigate any breach of our Terms of Use or this Privacy Policy. We also use this information to track potential problems and trends and customize our support responses to better serve you. We do not use this information for advertising.

**Please Note:** Our Services are a dynamic, innovative environment, which means we are always seeking to improve the Services we offer you. We often introduce new features, some of which may result in the collection of new information (for example, when the badges feature will be launched, we will be collecting information about project completion for which Members were enrolled in and the difficulty level of them). Furthermore, new partnerships or corporate acquisitions may result in new features, and we may potentially collect new types of information. If we start collecting substantially new types of personal information and materially change how we handle your data, we will modify this Privacy Policy and notify you in accordance with this Policy.

## **Use of Information**

We will not trade or sell your PII in any manner, except as specified herein, or unless express consent is sought from you. We use the information provided by you and collected from you primarily for the purposes of rendering the Services sought by you. Additionally, we would also be using the information for our internal operational purposes, such as providing, maintaining, evaluating, and improving the Channels and the Services, and also for providing customer support. We would also be sharing the information with others in the manner provided in this Privacy Policy.

In addition to the disclosures reasonably necessary for the purposes identified above, we may disclose your PII to the extent that it is required to do so: (i) by law, (ii) in connection with any legal proceedings or prospective legal proceedings, (iii) in order to establish, exercise or defend its legal rights, (iv) on account of a governmental or judicial request, (v) to enforce or apply our terms of use with you, or (vi) to protect the rights or safety of our Company or its users.

AFSPL may have presence on various sites, including but not limited to LinkedIn, Facebook, Twitter, YouTube and blogs, which are promotional and business initiatives to connect to a larger group of people. The domain links contained therein may either direct you to our Channel or request your participation by way of feedback, suggestions, etc. Information arising in this manner shall also be collected and used by AFSPL to increase user awareness and access and improve the Channel and the Services. AFSPL, in this regard, fully disclaims any liability(ies) or claim(s), which may arise by use/misuse of your feedback, suggestions, views, etc. on any such sites or blogs, by any third party, whether or not known to AFSPL.

Any Non-Personal Information and data and analyses arising therefrom may be shared by AFSPL to its existing and potential partners, advertisers, investors, customers, and others.

In the event of a loss, theft or malfunctioning of your device, you are required to promptly inform us of the same, in order for us to disable the Services accessible through such device. You understand and accept that the reporting of such an event is solely your responsibility, contingent to which, we may enable you to access our Services as was previously available to you with the same terms and conditions as was previously applicable. However, we do not warrant the replacement or refund of our Services, on account of the loss, theft, malfunctioning etc. of your device, through which our Services were previously being accessed by you.

## **WHAT ANDROID PERMISSIONS ARE ADDITIONALLY REQUIRED WHILE USING OUR MOBILE APPLICATION?**

When AF SPL app/s are installed on your phone, a list of permissions appears. Since there is no option to customize those permissions, below is a description of the permissions that AF SPL requires and the data that AF SPL shall access and use.

### **IMPORTANT INFORMATION ABOUT PLATFORM PERMISSIONS**

Most mobile platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without your consent. These platforms have different permission systems for obtaining your consent. Android devices will notify you of the permissions that the AF SPL app/s seeks before you first use the app, and your use of the app constitutes your consent. Sometimes these permissions require more explanation than the platforms themselves provide, and the permissions we request will change over time, so we have created these pages to serve as up-to-date resources for our users.

#### **Android permissions:**

**Device & App history:** We need your device permission to get information about your device, like OS name, OS version, mobile network, hardware model, preferred language, installed apps etc. Based on these inputs, we intend to optimize your overall experience by understanding your preferences and by using OS specific capabilities.

**Identity:** This permission enables us to know about details of your account(s) on your mobile device. We use this info to auto-fill your email ID's and provide a typing free in-funnel experience. It also allows facilitating your Facebook login.

**Contacts:** If you allow us to access your contacts, it enables us to make it easy to get referred by your friends and also send across referral links to your friends. This information will be stored on our servers and synced from your phone.

**Location:** This permission enables us to provide you a personalized experience based on your location. When you plan to make an EMI payment using a nearby collection outlet, we auto-detect your location and suggest you the nearest outlet. This permission also enables us to know more about your popular hanging out areas and factor those in our algorithm.

**SMS:** If you allow us to access your SMS, we read your SMS to autofill and verify the OTP used to validate your mobile number when creating an account with AF SPL - this provides you a seamless experience during that process. We also collect your SMS data to analyse the data around specific financial transactions for statistical analysis or for credit rating.

**Phone:** The app requires access to make phone calls so that you can make phone calls to our customer contact center directly through the app. This permission also enables us to understand more about your social interactions and factor that in our credit scoring algorithm.

Photos/Media/Files: The libraries in the app use these permissions to make it easy for you to upload existing pictures from the gallery or save newly clicked photos for document submission.

Camera: This permission enables us to make it easy for you to click the picture of necessary documents for online submission.

Wi-Fi connection information: When you allow us the permission to detect your Wi-Fi connection, we optimize your experience based on the connection speed.

Device ID & Call information: This permission is used to detect your Android ID through which we can uniquely identify users.

## **WITH WHOM IS YOUR PERSONAL INFORMATION SHARED?**

Any information share by you is used by us and/or authorised service partners and agencies to support your interaction with us, to offer you Services in the best possible manner and to contact you again about other services and products that we may offer. By submitting your Personal Information to AFSP, you expressly acknowledge and consent to AFSP using such information, and to process such information in a manner deemed fit by AFSP. This may also involve conducting data analysis and research using such information.

Additionally, we and our partners shall be entitled to check with credit information companies and/ or other financial institutions for your credit scores, credit information related activities and your financial information as well as that of any co-borrower(s) and/ or guarantor(s), prior to your accessing any financial products or for accessing any financial products on our platform. Further, from time to time, we and our partners shall also be entitled to disclose all information shared by you or relating to you or relating to any co-borrower(s) and/ or guarantor(s) with credit information companies and other similar financial entities to whom such information may be required to be provided under applicable law or in accordance with RBI guidelines. Accordingly, this Privacy Policy shall stand equally applicable in its entirety to any co-borrower(s) and/ or guarantor(s) accessing or facilitating access of the Services on our Platform.

## **HOW DOES AFSP PROTECT MY PERSONAL INFORMATION?**

AFSP is committed to protecting the privacy and the confidentiality of your Personal Information. Whenever AFSP obtains Personal Information from you, our Channel uses commercially reasonable efforts and general industry standards to protect it from any unauthorized access or disclosure. Access to your Personal Information is limited to AFSP's personnel and such authorized third parties who may access your data on our behalf or may assist us in providing the Services. AFSP uses its best endeavors to maintain physical, electronic and procedural safeguards that aim to protect your Personal Information against loss, misuse, damage, modification, and unauthorized access or disclosure. However, AFSP assumes no liability whatsoever for any disclosure of Personal Information due to unauthorized third party access or non-permitted acts of authorised third parties, or any other acts or omissions beyond the reasonable control of AFSP.

## **WHAT SECURITY PRECAUTIONS ARE IN PLACE TO PROTECT MY PERSONAL INFORMATION AGAINST LOSS OR MISUSE?**

AFSPL makes every reasonable effort to preserve the privacy and confidentiality of your information shared with us. We implement standard measures to protect against unauthorized access to and unlawful interception of Personal Information. However, no Channel can fully eliminate security risks.

We reserve the right to disclose information shared by you without your consent (express or implied) and without any liabilities to you when required or permitted by law. We also reserve the right to disclose information shared by you without your consent (express or implied) and without any liabilities to you when we have a good-faith belief that such disclosure is necessary or required to: (i) comply with an appropriate law enforcement investigation, current judicial proceeding, a court order or legal process served on us, or (ii) conform to the legal requirements, compliance/reporting to administrative and judicial authorities, (iii) protect and defend the rights or property of the shareholders or management of AFSPL, or the users of AFSPL, and (iv) enable authorised persons who provide certain support services to us to discharge their functions satisfactorily.

Further, we reserve the right to disclose information shared by you without your consent with authorised entities engaged in providing credit scores, credit ratings, credit analyses or credit information related services (including CIBIL, etc.).

### **Storage of Information**

All information collected in connection with the Services and/or on your device(s) may be stored with us. Information is also stored on your device(s) and is subject to the security and privacy policies of your device and storage providers. Any breach of such security and privacy is beyond our control, and you acknowledge that we cannot, and will not, be held responsible for such breaches security or privacy.

If our Company uses a vendor for storage of Information, all data storage by the vendor will be subject to the vendor's security systems, and any breach of such privacy or security policies of the vendor will be beyond the reasonable control of our Company, and our Company will not be held responsible for such breaches.

You understand and agree that we may continue to store your Information after you cease use of the Services or disable your use of, access to, or otherwise of the Services or the Platform. Please note that we shall not use, share or/ and disclose your PII with its affiliates, vendors, third parties etc., after you cease use of the Services or disable your use of, access to, or otherwise of the Services or the Platform, unless required by law to do so. We may however continue to use, share and/ or disclose your NPI in furtherance of its Policies.

### **Commitment to Security**

We are committed in protecting your privacy and has taken all necessary and reasonable measures to protect your Information and handle the same in a safe and responsible manner in accordance with the terms and conditions of this Privacy Policy. The Company ensures to safeguard the security of your PII

by implementing standard electronic and managerial processes to protect against unauthorised access to and unlawful interception of PII.

We will ensure its best efforts to protect your Information available with us in line with commercially reasonable efforts and general industry standards; however, the Company does not represent, warrant, or guarantee that your Information will be protected against unauthorized access, loss, misuse, or alterations beyond our reasonable control, and we do not accept any liability for the security of the Information submitted us or for your or any third parties' misuse of your Information.

We may provide links to any other website or locations for your convenience, but the provision of such links does not signify our endorsement of such other website or location or its contents. We Have no control over, do not review, and cannot be responsible for these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or location or its contents.

Except as provided elsewhere in this Privacy Policy, we provide limited access to PII to those persons (including employees and contractors) who have a business need for such access.

### **THIRD-PARTY SERVICES**

1. In general, the third-party providers used and authorised by us will only collect and use your information to the extent necessary to allow them to perform the services authorised by us.
2. However, certain third-party service providers such as payment gateways and other payment transaction processors have their own privacy policies in respect to the information we are required to provide to them for your payment-related transactions.
3. Once you leave our Channel or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our Channel's Terms of Service.
4. When you click on certain links on our Channel, they may direct you away from our Channel. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

### **Payment Related Details**

We use payment gateways for processing online payments. We do not store your credit card details or debit card details or your internet banking details on our servers. The payment data is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS) when processing your payments. Your transaction data is only used as long as is necessary to complete your transaction and is not saved thereafter.

The payment gateway used by us adheres to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.

PCI-DSS requirements will help ensure the secure handling of payment data information by the Platform. Payment gateways and other payment transaction processors will have their own privacy policies in respect to the information you are required to provide to them and we are required to provide



to them for your payment-related transactions, and as such, those details will be governed by their privacy policies.

## **CHANGES TO THIS PRIVACY POLICY**

1. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Channel. If we make material changes to this Privacy Policy, we will notify you that it has been updated to enable you to review the modified Privacy Policy.
2. If AFSPL is acquired or merged with another entity or if the Services are transferred to any other entity as part of a business arrangement, your information may be transferred to the new entity. In such an event, to the extent possible, we will notify you and try ensure continuance of the Privacy Policy (albeit in modified forms).

## **Governing Law**

Our Company is incorporated in, and based out of India, and is duty bound to abide by Indian laws. We may not have complied with some privacy laws of other countries and further represents to be unaware of such other legal requirements

## **QUESTIONS AND CONTACT INFORMATION**

1. If you would like to: access, correct, amend or delete any Personal Information, please register a complaint. If you want more information on this Privacy Policy or have any grievances with respect to the Privacy Policy, please contact us at [privacy@loan2wheels.com](mailto:privacy@loan2wheels.com). AFSPL will respond to all reasonable concerns or inquiries.
2. **I have a complaint/concern**

In accordance with the relevant provisions of the Information Technology Act, 2000 and the rules made thereunder, the name and contact details of the Grievance Officer who can be contacted with respect to any complaints or concerns including those pertaining to breach of AFSPL's Terms of Use, Privacy Policy and other policies or questions are published as under:

Grievance Officer Name: Hari Prasad BS  
Email address: [hariprasad@loan2wheels.com](mailto:hariprasad@loan2wheels.com)

The Grievance Officer can be contacted between 10:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays.