

PRIVACY POLICY

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Introduction

In the course of using this website or availing the products and services via the online or otherwise, the application forms or questionnaires etc., IFIN Securities Finance Limited (ISFL) /its Loan Service Providers/ Channel Partners/ group companies may become privy to the personal information including information that is of a confidential nature like bank account, broking account, demat account, investment and net worth details of its Customers and may use the same for various purposes including analyzing the credit worthiness of the client and providing value added service to customers. ISFL undertakes to obtain consent of its customers, wherever not available, before disclosure or transfer of information to third parties.

Objective

IFIN Securities Finance Limited (ISFL) may collect and store information about customers when they visit our site, use our services, or view our online advertisements. The information which ISFL collects and store during normal use of the site will be kept highly confidential and will be used to monitor use of the site and to help further development of our products and services that matches customers' needs as closely as possible.

ISFL strongly committed in protecting the personal and financial information that customers submit to ISFL and recognize the importance of protecting their personal and financial information.

Scope

All visitors who visit the site or customers, prospective customers (collectively Customers) providing information to ISFL are covered under this Policy. By visiting on www.isflonline.com and registering with us, you agree to this privacy policy.

ISFL shall obtain Your consent in writing (and includes electronic consent) before collecting Personal Information for providing Services. Personal information for purposes of this Policy includes information that identifies you, such as your full name, email, gender, photograph, mailing address, postal code, phone number, Permanent Account Number (PAN); etc

All Personal Information so provided will be on an 'as on' basis and ISFL shall not be responsible for the authenticity of the Personal Information supplied by you. Personal Information which is provided or collected from you are solely for the purposes required to provide customized products or services or facilities which has been agreed by you by ISFL / Facility Provider / Third Party Service Entity.

Services shall include all provisions of services and facilities and connected activities which are provided in connection with offering of products and services as a customer of ISFL.

Information Collection and Sharing

ISFL will limit the collection and use of customer information only on a need-to-know basis to deliver better service to the Customers. ISFL may use and share the information provided by the Customers with its Affiliates and third parties for providing services and any service-related activities such as collections, customer service and to notify or contact the Customers regarding any problems with, or the expiration of, such services. In this regard, it may be necessary to disclose the customer information to one or more agents, business partners and service provider of ISFL and their sub-agents, but such agents, and sub-agents, will be required to agree to use the information obtained from ISFL only for these purposes.

ISFL undertakes not to disclose the information provided by the Customers to any person, unless such action is necessary to:

- Conform to legal requirements or comply with legal process;
- Protect and defend ISFL or its Affiliates' rights, interests or property;
- Enforce the terms and conditions of the products or services; or
- Confirm the transaction details

ISFL may share personal information in response to a court order, a request for cooperation from a law enforcement or other government agency or any statutory authorities or any regulator as the case may be, or as otherwise required by law; to persons acting as representative capacity on behalf of customers or ISFL; to defend against legal claims; to investigate, prevent, or take other action regarding illegal activity, suspected fraud, suspected violations of terms and conditions associated with any of our products or services, or other wrongdoing; or to protect and defend the rights, property or safety of our company, our users, our employees, or others.

ISFL may share personal information with organization or individuals that perform functions on behalf of ISFL. These service providers are granted access to personal information for the purpose of performing their functions for ISFL.

The Customer authorizes ISFL to exchange, share, part with all information related to the details and transaction history of the Customers to its Associates / banks / financial institutions / credit bureaus / agencies/participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis and credit scoring,

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verification or risk management and shall not hold ISFL liable for use or disclosure of this information.

ISFL share information as part of normal business operations, such as providing customers with any services to which they subscribe, and any activity related to such services such as collecting fees for those services, and informing customers about these services.

Privacy

Your privacy is important to us. ISFL is strongly committed to protect the privacy of its Customers and has taken all necessary and reasonable measures to protect the confidentiality of the customer information and its transmission through the world wide web or otherwise and it shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Commitment or in terms of the agreements, if any, with the Customers.

The Customers shall not disclose to any other person, in any manner whatsoever, any information relating to ISFL or its Associates of a confidential nature obtained in the course of availing the services through the website. Failure to comply with this obligation shall be deemed a serious breach of the terms herein and shall entitle ISFL or its Associates to terminate the services, without prejudice to any damages, to which the customer may be entitled otherwise.

ISFL or any Third Party Service Entity may disclose Personal Information where it is under legal obligation to do so or where it is mandated under law. Personal information may be transferred to any group company of ISFL at any time or to a third party only as a result of a sale, acquisition, merger, reorganization or other change in control. If ISFL is sold, merged or transferred any part of our business, part of the sale may include Your Personal Information.

This privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

Links to Other Sites

Our website(s) has links to other website(s) in the World Wide Web. The privacy policies of these website(s) is not under our control. Once you leave our servers, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. It is advisable to read their privacy policies for further information. This privacy statement applies solely to information collected by ISFL Web site.

The customers shall ensure to protect their privacy by maintaining the secrecy of the username and password for any of our services.

Information collected automatically

ISFL also may collect some information automatically, which include:

- IP address
- Information about web browser software and version;
- General geographic location indicated by IP address;
- Website that referred to us, and similar information.

Like most standard Web site servers ISFL uses log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use etc. . IP addresses, etc. are not linked to personally identifiable information.

Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enable the site's or service provider's systems to recognize your browser and capture and remember certain information. We use cookies to help us understand and save your preferences for future visits, keep track of advertisements and compile aggregate data about site traffic and site interaction, so that we can offer better site experiences and tools in the future.

Storage of Data

a) Data Retention

All such Personal Information collected shall be retained so long as you are having account/product with ISFL or by any of its third party service entities/service provider (“**Third Party Service Entity**”) and remain active to avail various services/product or as may be required under the applicable extant regulatory guidelines and laws or as per applicable policies of ISFL if any. Unless the Personal Information is purged permanently, the Personal Information may remain on the servers and ISFL may however use the Personal Information for data analytics purposes and procedures for improving the provisions of services/facilities by them in a non-identifiable manner.

b) Restriction on use of data: The data so collected from the clients/customers will be strictly used for providing products/services/ facilities in connection with offering of products and services as a customer of ISFL.

c) Data Destruction protocol will be as decided by ISFL from time to time.

Standards for handling security breach

ISFL ensures the safety and security of the data of the clients and follow these below said Standards for handling security breaches, if any :

1. ISO 27000 Series
2. IT Act
3. Copyright Act
4. Patent Law &
5. Cert-In guide lines.

Update Personal Information:

ISFL / Third Party Service Entity encourages you to update this information as and when there are any changes. You are also entitled to review the information provided and ensure that any Personal Information or sensitive personal data or information found to be inaccurate or deficient be corrected or amended as feasible. However, ISFL shall not be responsible for the authenticity of the Personal Information or sensitive personal data or information supplied by you.

DISCLOSURE TO THIRD PARTIES

We will share your information with only our registered third parties including our regulated financial partners for provision of Services on the Website/ App. We will share Your information with third parties only in such manner as described below:

- a. We disclose and share Your information with the financial service providers, banks or NBFCs and our third party partners for facilitation of a loan or facility or line of credit or purchase of a product;
- b. We share Your information with our third party partners in order to conduct data analysis in order to serve You better and provide Services on our Platform;
- c. We and our affiliates may share Your information with another business entity should we (or our assets) merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. Should such a transaction occur than any business entity (or the new combined entity) receiving any such information from Us shall be bound by this Policy with respect to your information.
- d. We will disclose the information to our third party technology and credit partners to perform credit checks and credit analysis like Credit Bureaus or third party data source providers;
- e. By using the Platform, you hereby grant your consent to the Company to share/disclose your Personal Information (i) To the concerned third parties in connection with the Services; and (ii) With the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities, in accordance with applicable laws of India.

f. We shall disclose your KYC journey or any data with respect to the same to the relevant regulatory authorities as a part of our statutory audit process. Please note that your Aadhaar number shall never be disclosed.

In case we use or disclose your information for any purpose not specified above, we will take your explicit consent.

Privacy Policy Changes:

This policy provides a general statement of the ways in which ISFL aims to protect customers' information. ISFL may also occasionally update this privacy policy to reflect changes in our practices concerning the collection and use of customers' information. As a result, ISFL encourages customers to review the privacy policy before accessing the websites or otherwise furnishing data to ISFL.

Policy Review:

ISFL reserve the right to change or update this policy at any time. Such changes shall be effective immediately upon posting to this site.

At ISFL, we value your relationship and will at all times strive to ensure your privacy.

Link to access the privacy policy of Loan Service provider (LSP)

Loan service provider facilitates to onboard customers via digital mode and for providing the services certain information of the clients/customers are required. Therefore ISFL encourages the customers to be aware when they leave our site and to read the privacy statements of each and every Web site that collects personally identifiable information. The link to privacy policy of LSP is <https://dhanlap.com/privacy>.