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**MONEDO FINANCIAL SERVICES PVT. LTD.**

**PRIVACY POLICY**

FOR INTERNAL CIRCULATION ONLY

### Document Control Information

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The website [www.monedo.in](http://www.monedo.in) is owned and operated by Monedo Financial Services Private Limited (the “**Company**”) adheres strictly to information technology and data protection laws, rules and regulations. In order to ensure compliance with the same, the Company has implemented this privacy policy (the “**Privacy Policy**”) to set out the manner in which the Company handles the information relating to or collected from the users/registrants (“**User**”) of the website and/or any software application owned and operated by the Company, collectively referred to as, the “**Platform**”. This Privacy Policy also specifies the manner in which sensitive personal data or information (*if any*) is collected, received, stored, processed, disclosed, transferred, dealt with and handled by the Company in relation to your use of the Platform. This Privacy Policy does not apply to information that you provide to, or that is collected by, any third-party through the Platform, and any third party site that you access or use in connection with using the services offered through the Platform.

Please read the privacy policy carefully before using or registering on the Platform or accessing any material, information or services on the Platform. Your visit or use of the Platform or services offered through the Platform shall signify your unconditional acceptance of this privacy policy, and your agreement to be legally bound by the same.

## 1. Type of Information:

This policy is applicable to any ‘information’ that is collected:

- a) By Monedo and which is in the nature of personal / sensitive personal information/demographic information of the User provided to Monedo online or offline ( i.e. Name, age, date of birth, gender, address, mobile number, email id, PAN number, photograph/**image**, or collected from CKYC registry/Aadhar Authority/Digi locker, bank account details credit scores, GST details, provident fund account details, provided to Monedo through mobile application, website and/or at the time of availing various financial products/services).
- b) by Monedo server from User’s browser, mobile app or mobile device, including contact information, cookies etc.,
- c) by Monedo, which may or may not be personally identifiable and/or traffic information; and
- d) by Monedo, its dealers, agents/agencies, including the server from the User’s browser mobile app or mobile device.

## 2. Collection of Information

This Privacy Policy applies to information that:

- You may provide to us while registering on our Platform and/or using our services. This includes the information that the Company: (a) collects from you when you register on the Platform, such as your name, electronic mail address, password, phone number, home address, Aadhaar number, User records, proof of identity, proof of address, feedback, orders, and other relevant details; (b) collects from you related to the manner and mode of any payments made through the Platform, such as details of your bank account, credit card,

debit card, prepaid card, travel card, etc.; (c) collects regarding your content, received, uploaded or provided using the Platform; and (d) collects via third parties such as payment service providers or online merchants relating to your payment transaction history and your previous purchases. All information disclosed by you shall be deemed to be disclosed willingly and without any coercion. No liability pertaining to the authenticity/genuineness/misrepresentation/fraud/negligence of the information disclosed shall lie on the Company;

- The Company may collect information via third parties, such as account information service providers (more specifically, please be advised that by connecting to your bank account, Monedo obtains certain information: your full name, address, email address, Aadhaar number, personal ID, phone and/or any other identifying information available, together with information about the current balance and transactions for the last 12 months), credit information companies, or any other parties with whom the Company has, from time to time, entered into agreements that include data collection and/or transfer; and
- The Company may automatically receive and record on its server logs when you access or use our Platform, including but not limited to, your location, information about Your internet connection and mobile device, Internet Protocol address, cookie information, web beacon information and details of the web pages you visit and your interactions on them. Further, the Company may collect information about your preferences and settings such as time zone and language, your searches and the results you selected from the search and your transactional information.
- As per the provisions of RBI guidelines dated 02nd September, 2022, the Company shall ensure that any collection of data by their Digital Lending Apps (DLAs) of Company which are on need-based should be taken with prior and explicit consent of the borrower having an audit trail of the borrower.
- As per the provisions of RBI Guidelines dated 02nd September, 2022, user is hereby informed that the third party service provider will 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. The third-party service provider is obligated not to disclose or use the Information for any other purpose.

### **3. Usage of Information**

The information gathered by the Company as specified in Clause 1, may be used for the following purposes:

- for your registration, login and management of the Platform;
- to evaluate your creditworthiness and expected repayment performance and carrying out affordability tests in the context of determining your eligibility for a given consumer credit product;
- to confirm your identity directly and/or through third parties;
- to prepare and conclude a credit/loan agreement and other related documentation;
- internal administrative processes directly related to the provision or management of a consumer credit product and your consumer credit account;
- to monitor the quality of our financial services software and processes to detect errors or areas of improvement;
- to understand your preferences and to enhance and customize your experience of using the Platform;

- to communicate with you through mail, e-mail and telephone, in connection with negotiating, concluding or managing the contractual relationship with the Company and the consumer credit account;
- to respond to your comments, reviews and questions and provide better service;
- to better identify and retain good customers, and to improve customer relations;
- to carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between You and the Company, including for billing and collection of amounts;
- to make requests to and report any and all information regarding You to credit information companies from time to time;
- to authenticate Your Aadhaar number and undertake related activities under the applicable laws;
- to undertake Know Your Customer (KYC) compliance as required under applicable laws;
- to communicate important notices or changes in the services provided by the Company, use of the Platform and the terms/policies which govern the relationship between You and the Company;
- for internal purposes such as auditing, data analysis, research and improvement relating to the Platform or the services provided through the Platform;
- to create personalised statistical data for use in creditworthiness and affordability assessments of your future consumer credit applications;
- to identify, prevent and combat fraud, money laundering and terrorism financing;
- for promotion and marketing purposes;
- to offer new products and services and new features in existing services you are using;
- for sharing such information with any third party, including any service providers and any group companies of the Company, in the course of providing the services through the Platform;
- for transferring such information to third parties for further processing, particularly accounting, audit and law firms;
- for assignment or transfer, in whole or in part, of the rights deriving from a contract between you and the Company;
- to analyse risk and ensure security and legality of the services provided; and
- to transfer data to the regulatory authorities or other appropriate authorities as required by law.
- As per the provisions of RBI guidelines dated 02nd September, 2022, the User are informed that the Digital Lending Apps (DLAs) of the Company desist from accessing mobile phone resources like file and media, contact list, call logs, telephony functions, etc.

The data gathered from you may also be used for any reason incidental to the reasons listed above; and for any other purpose with your consent.

#### **4. Collection of Information by Third-Party Sites and Advertisers**

When you use the Platform, there may be certain links which may direct you to other websites or applications not operated/maintained by the Company (the "**Third Party Site**"). The manner in which your information is collected, received, stored, processed, disclosed, transferred, dealt with and handled by such third party site(s) is governed by the terms and conditions and privacy policy of the respective third party site(s). The Company hereby expressly disclaims all liabilities with respect to the manner in which the third party site collects and/or uses your information. On our Platform, there may be third parties who advertise their products and/or services. Such third parties

may place or recognize a unique “cookie” on your browser and may use information about your visits to our platform and other websites in order to provide advertisements about goods and services of interest to you. We shall, in no event, be liable for any unauthorized or unlawful disclosures of your personal information made by advertisers, who are not subject to our control.

## 5. Service Providers

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

- To facilitate Monedo’s products/ services;
- To provide the service on behalf of Monedo;
- To perform any ancillary service related to products/services of Monedo and/or its Group;
- To assist Monedo in analysing how the services are used; and
- To assist Monedo and/or its Group in evaluating and improvising the service standards.

User is hereby informed that the third-party service provider/agent/agencies will have access to your Information on a need to know basis to assist Monedo in rendering service and are restricted from using the same for any other reason and Monedo have developed the said feature. The third-party service provider is obligated not to disclose or use the Information for any other purpose.

## 6. Disclosure to Third Parties

The Company may need to disclose your information, if required to do so by law and if such action is necessary to: (a) comply with a legal obligation; (b) protect and defend the rights or property of the Company, including to enforce our agreements, policies, and Terms of Use; (c) protect the personal safety of the Company, the Users, or any person, in an emergency; (d) protect the Company from incurring any legal liability; (e) firms representing Monedo in judicial proceedings and/or accounting and auditing firms providing services to Monedo; and (f) for reasons incidental to the above. In such an event the Company shall be under no obligation to inform you or seek your approval or consent.

The Company shall be at liberty to disclose your information to: (i) any third party to facilitate the provision of services through the Platform; and (iii) any third parties who provide services, such as auditing, data analysis, Platform improvement and assistance with delivery of relevant marketing messages and advertisements. If you provide a mobile phone number and/or e-mail address, the Company or the third-party service providers or the persons authorized by them, may send you text messages/e-mails in relation to your use of the Platform. The Company contractually requires these third parties to keep such information confidential and use it only for the purposes for which the Company discloses it to them. These third parties may view, edit, or set their own cookies or may place beacons on your personal information.

We may also share aggregated (and de-identified) information with third parties in our discretion as per the requirement of law.

We may share personal information with third-party vendors, consultants, and other service providers who work for the Company, who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

The Company may disclose or transfer your information (*personal or otherwise*) to any subsidiary or affiliate, and to a third party if the Company sells, transfers or divests all or a portion of the Company's business or assets to another company in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding. Such third parties shall be contractually bound to not disclose further, any personal information disclosed to them.

You acknowledge and agree that the Company may transfer sensitive personal data or information to third parties outside India to the extent required or necessary for any of the above-mentioned purposes.

## **7. Data Governance and trainings**

Securing User's Information is of paramount importance to Monedo. Following are some of the initiatives by Monedo to security privacy of the User's Information:

- a) Monedo has reasonable management, technical and administrative measures in place to protect Information within Monedo.
- b) Sound technical controls around Information and underlying systems are in place.
- c) Monedo adheres to multiple regulatory and statutory requirements like RBI's Master Direction for NBFC, Guidelines for Prepaid payment instruments, NPCI guidelines for Data localization, CKYC etc. to name a few.
- d) Monedo conducts periodic internal and external audits of its systems.
- e) In all contractual arrangements, we require Monedo employees, third party agencies/service providers to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.
- f) Any acts involving (i) unauthorized usage/ sharing of Information, (ii) breach of security procedures; (iii) usage of Information for unlawful gain (iv) breach of IT policy/procedure; and (v)breach of confidentiality as per employment terms and/or Code of Conduct, shall warrant appropriate disciplinary action as per Company's Policy.

## **8. Security**

The Company shall take reasonable steps to help protect your rights of privacy and your information (*personal or otherwise*) in an effort to prevent loss, misuse, unauthorized access, disclosure, alteration, or destruction of such information, in compliance with the applicable laws. When payment card account information is being transmitted on or through the Platform, it will be protected by encryption technology. You expressly consent to the sharing of 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.. The Company does not itself store your payment card account information, and does not have direct control over or responsibility for your payment card account information.



Hence, the Company cannot guarantee that transmissions of your payment card account information or personal information will always be secure or that unauthorized third parties will never be able to defeat the security measures taken by the Company or the Company's third party service providers. The Company assumes no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third party access, or other causes beyond its control. You play an important role in keeping your personal information secure. You should not share your user name, password, or other security information for your account with anyone. The provisions of RBI Guidelines dated 02nd September, 2022, stating that the company shall ensure that no biometric data is stored/collected in the systems associated with the DLAs of the Company and their LSPs, unless allowed under extent of statutory guidelines.

## 9. User Discretion

- You may opt out of receiving promotional emails from the Company by following the instructions in those emails. If you opt out, the Company may still send you non-promotional emails, such as emails about the services availed through the Platform and emails about your account.
- Cookie choices. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject cookies. If you choose to remove or reject cookies, this could affect certain features or services on the Platform.
- Should you desire to opt out of disclosing your information to the Company, the Company requests that you close your User account and stop accessing the Platform and the services on the Platform. Thereafter, the Company may delete your information (personal or otherwise) or de-identify it so that it is anonymous and not attributable to you.

## 10. Grievances

In the event you have any grievances relating to the Privacy Policy, please inform the Company within 24 hours of occurrence of the instance from which the grievance has arisen, by writing an email to the Grievance Officer at [grievanceofficer@monedo.in](mailto:grievanceofficer@monedo.in). The Company shall respond to all grievances lodged with the Company in accordance with [Grievance Redressal Policy](#)

## 11. Amendments

The Company retains an unconditional right to modify or amend this Privacy Policy without any requirement to notify you of the same. You can determine when this Privacy Policy was last modified by referring to the "Last Updated" legend above. It shall be your responsibility to check this Privacy Policy periodically for changes. Your continued use of the Platform following the posting of changes to this Privacy Policy on the Platform, will constitute your consent and acceptance of those changes.