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## Privacy Policy

Version 3.0

Version History			
Version	Amendments	Date	Approved by
1.0	First release	10.11.2023	Board Meeting
2.0	Second release	29.07.2024	Mr. Satish Dhupdale (Chief Digital Officer)
3.0	Third release	12.02.2026	Board Meeting

## Privacy Policy

This "Privacy Policy" has been formulated pursuant to the legal requirement under the provisions of RBI Guidelines on Digital Lending dated Sep 02, 2022 and Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011; and other applicable acts, regulations and rules which require the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information and all applicable laws, regulations, guidelines provided by applicable regulatory authorities including but not limited to the RBI.

### **Purpose of the Policy:**

Light Microfinance Private Limited ("Company") intends to protect the privacy of its customers and Customers/Users on its Website ([www.lightfinance.com](http://www.lightfinance.com)) and mobile applications (Mobilight, LightMoney) and the privacy of the data provided by them to the Company from time to time. This website [www.lightfinance.com](http://www.lightfinance.com) and mobile applications (Mobilight, LightMoney) ('collectively referred to as Website) are owned and operated by the management of the Company which expression shall mean and include its affiliates, successors and permitted assigns. The Company provides services to the Customers/Users through the Website and Mobile Applications are committed to protecting and respecting the privacy of the Customers/Users.

In order to facilitate and provide you (and co-applicants, members, nominees, if any) with the Services through the Mobile App we (i.e., the Company) and Website, need to collect various data and information from you with your prior and explicit consent. The manner in which this data and information is collected, retained, shared, stored, and processed by us shall be as per this Policy. By setting up an account on this Website, you agree to the processing, storage, usage and sharing of the data provided by you pursuant to this Policy.

While using this Website or availing the products and services vide the online application forms and questionnaires, the Company and its affiliates may become privy to the personal information of its customers and Customers/Users Customers/Users, including information that is of a confidential nature.

The Company is strongly committed to protecting the privacy of its Customers/Users and has taken all necessary and reasonable measures to protect the confidentiality of the Customers/Users information and its transmission through the World Wide Web or any other mode. The Company shall not be held liable for disclosure of confidential information if such disclosure is in accordance with this Policy or in accordance with the terms of any agreements entered with the Customers/Users.

**“Customer(s)”** shall mean a person who has availed or is availing at least one of the loan products of the Company.

**“User(s)”** shall mean and include all individuals, companies and private organizations, any entity that visit the Website and provide information to the Company through any of the modes referred to in the clause on “Collection of Information” below.

## COLLECTION OF INFORMATION

The Company may collect and process such information from the Customers/Users, including but not limited to the below mentioned:

- Information that the Customers /Users provide to the Company. This includes contact information such as name, email address, mailing address, phone number, and financial information if any, unique identifiers such as username, account number, and password and preferences information such as favorites lists and transaction history.
- Information that the Customers/Users provide when they write directly to the Company (including by way of e-mail).
- Information that the Customers /Users provide to the Company over the telephone.
- Information collected by the Company by way of collection of the physical documents for the purpose of verification of personal customer data.
- The Company may make and keep a record of the information shared by the Customers /Users.
- Information that the Customers/Users provide to the Company by completing surveys.
- Information relating to logs is automatically reported by the Customers/Users browser each time they accesses a website. When the Customer/User uses the Website, the Company servers automatically record certain information that the Customers/Users web browser sends whenever they visits any website. These server logs may include information such as the Customers/Users web request, Internet Protocol (IP) address, browser type, referring/ exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, geographic location data while using the Website, and other such information. The Company uses this information, which does not identify Customers/Users, to analyses trends, to administer the Website, to track Customers/Users movements around the Website and to gather demographic information about the Customer/User base. The Company does not link this automatically collected data to personally identifiable information, except for location data collected from field staff members using the Website as described above.
- The Company may have one-time access to your mobile/ device for collecting information to process your loan application or provide you its products/services. Please note that your consent shall be purely voluntary, however, the Company shall have the discretion to deny its products/

services, in case it is not able to obtain adequate information as per its internal credit policy.

## NON-DISCLOSURE

The Company pledges that it shall not sell or rent Customers/Users personal details to anyone. The Company will protect every bit of the Customers/Users business or personal information and maintain the confidentiality of the same. With this seal of trust, the Company makes its services available to the Customers/Users for assessment and analysis that include credit and behavior scoring, market, and product analysis.

The Company guarantees that it is going to keep all information confidential except in the following cases:

- The Company may disclose Customers/Users information to governmental and other statutory bodies who have appropriate authorization to access the same for any specific legal purposes.
- The Company may disclose Customers/Users information if it is under a duty to do so to comply with any legal obligation, or in order to enforce or apply the Terms of Use (displayed on the Website), or to protect the rights, property, or safety of the Company its Customers/Users or others. This includes exchanging information with other companies / agencies that work for fraud prevention and credit reference.
- The Company may disclose Customers/Users information to its agents, wherever applicable, under a strict code of confidentiality, in accordance with applicable laws, for the purpose of (i) providing the services and to perform the functions on your behalf or on behalf of the Company; (ii) marketing new products and services by the Company or by any of its agents; or (iii) or such other purposes as may be disclosed to the Customer/User. It is hereby declared that the Company shall be responsible for the use of such information by the agents.
- The Company may disclose Customers/Users' information to such third parties to whom it transfers its rights and duties under the customer agreement entered with the Customers/Users. In such an event, the said third parties' use of the information will be subject to such confidentiality obligations as contained in this Policy and the Company shall be responsible for the use of such information by the third parties
- The Company may disclose Customers/Users' information to any member of its related or group companies including its subsidiaries, its ultimate holding company, and its subsidiaries, as the case may be.
- If the Company sells or buys any business or assets, it may disclose the Customers/Users information to the prospective seller or buyer of such business or assets. User, email, and visitor information is generally one of the transferred business assets in these types of transactions. The Company may also transfer or assign such information during corporate divestitures,

mergers, or dissolution.

The Company shall ensure that in case of disclosure of whole or part of the Customers/Users information to a service provider or agent, within or outside India, the same shall be bound by obligations of confidentiality at least as strict as the Company obligations under this Privacy Policy and the information shall be accorded the same level of protection as provided by the Company under the terms of this Privacy Policy.

The Company will never sell or rent personal information of its clients to anyone, at any time, for any reason. The Company may use the Customers/Users personal information in the following ways, viz:

- Monitor, improve and administer the Website and improve the quality of services.
- Analyses how the Website is used, diagnose service or technical problems, maintain security.
- Remember information to help the User effectively access the Website.
- Monitor aggregate metrics such as total number of views, visitors, traffic, and demographic patterns.
- To confirm the User's identity to determine its eligibility to use the Website and avail of the services.
- To notify the User about changes to the Website.
- To enable the Company to comply with its legal and regulatory obligations.
- To help the User apply for certain products and services.
- For the purpose of sending administrative notices, service-related alerts, and other similar communication with a view to optimizing the efficiency of the Website.
- Doing market research, troubleshooting, protection against error and project planning etc.
- To reinforce the Company Terms of Use.

Access to personal information is strictly restricted and shared in accordance with certain specific internal procedures and safeguards that govern access and in accordance with applicable laws. Certain features of the Website are available for use without any need to provide details. Other features of the Website may require Customers/Users to provide details including but not limited to the Customers/Users name, address, mobile number, email address, PAN No., employment & income details etc.

## SECURITY OF INFORMATION

The Company takes the security of its customers/users information very seriously. The Company protects the customers/Users data using **Transport Layer Security (TLS)** protocol. This creates an encrypted connection between the User's browser and the Company's servers. All information always remains encrypted. If the Customer/User allows the Company to see its banking information online rather

than in paper form, it is on a read-only basis. The Company does not have access to change, edit, or modify bank account information in any manner whatsoever. The Company employees cannot view the User's banking username and passwords, and the same is securely stored in separate encrypted areas with its financial services providers.

All information provided to the Company is stored on its secure servers within India.

The Company uses commercially reasonable safeguards to preserve the integrity and security of the Customers/Users' information against loss, theft, unauthorized access, disclosure, reproduction, use or amendment.

The information that is collected from the Customers/Users may be transferred to, and stored at any destination in India. By submitting information on the Website, the Customers/Users agree to this transfer, storing and/ or processing. The Company will take such steps as it considers reasonably necessary and in adherence to applicable laws to ensure that the Customers/Users information is treated securely and in accordance with the Policy. The Company implements cyber security policy for handling all security breaches in compliance with applicable laws and regulations.

In using the Website, the Customers/Users accept the inherent security implications of data transmission over the internet and the World Wide Web cannot always be guaranteed as completely secure. Therefore, the use of the Website will be at the own risk of the Customers/Users.

The Company assumes no liability for any disclosure of information due to errors in transmission, unauthorized third-party access, or other acts of third parties, or acts or omissions beyond its reasonable control and the Customer/User agrees not to hold the Company responsible for any breach of security unless such breach has been caused as a direct result of gross negligence or willful default by The Company Pvt. Ltd.

In the event the Company becomes aware of any breach of the security of the Customers/Users information, it will promptly notify the Customers/Users and take appropriate action to the best of its ability to remedy such a breach.

## COOKIES

The Company collects certain information from the Customers/Users browser using small data files called "cookies." The Company uses session ID cookies to confirm that customers are logged in. This type of cookie helps the Company recognize a customer if he or she visits multiple pages on the Website during the same session, so that separate passwords are not required to access each page. These cookies terminate once the customer closes the browser. By default, the Company

uses a persistent cookie that stores customer login ID (but not password) to make it easier for the customer to login when returning to the Website. The Company encodes its cookies so that only the Company can interpret the information stored in them. The User may remove or block this cookie using the User's browser settings to disable the feature.

The Company also stores transaction history. The Company may collect additional information in ways not specifically described herein. For example, The Company may track information related to interactions with customer service or responses from surveys or other feedback tools. The Company uses this information to continually improve the service provided to the customers.

The Company's Privacy Policy does not cover the use of cookies by its partners and affiliates. The Company does not have access to or control over these cookies. The Company's partners and affiliates may use session ID cookies to provide a custom user experience and to track the success of the Company partnership with them.

## **WEB BEACONS**

The web pages of the Website contain electronic images known as "web beacons" (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyses how the Website is used. Web beacons may also be used in some of the Company's emails to know which emails and links recipients have opened, allowing it to gauge the effectiveness of its customer communications and marketing campaigns.

## **REFERRALS**

If the Customer/User wishes to introduce the Company/ the Website to any other person / entity, the Customer/User will be asked to provide such person / entity's name and email address. The Company will automatically send such person/entity an email inviting it or to visit the Website. The Company stores this information for the purpose of sending this email and keeping a record of the number of persons / entities referred by the Customers/Users. The Company may send additional emails to the said person / entity in connection with services offered by the Company. Such person / entity may contact the Company at [info@lightfinance.com](mailto:info@lightfinance.com) to request that this information be removed from the Company database.

## **LINKS TO THIRD-PARTY WEBSITES**

The Website includes links to other websites whose privacy practices may differ from those of the Company. The inclusion of a link does not imply any endorsement by the Company of the third-party website, the website's provider, or the information on the third-party website. If the Customers/Users submit personal information to any of those websites, such information is governed by the privacy policies of such third-party websites and The Company disclaims all responsibility

or liability with respect to these policies or the websites. The Customers/Users are encouraged to carefully read the privacy policy of any website that they visit.

## **SOCIAL MEDIA WIDGETS**

The Website includes Social Media Features, such as the Facebook “Like” button and Widgets, or interactive mini programs that run on the Website. These features may collect the Customers/Users’ IP address, which page the Customers/Users are visiting on the Website and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Website. The Customers/Users’ interactions with these features are governed by the privacy policy of the company providing it.

## **OPTING OUT OR EDITING CUSTOMER INFORMATION**

To opt out of email correspondence from the Company or make a change to (or delete) the User information stored in the Company records, please contact the Company at [info@lightfinance.com](mailto:info@lightfinance.com).

The Customer/User shall have the option (In the manner specified in the customer agreement) to give or deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the app delete/ forget the data. The Company shall be responsible to adhere to the same except where such request is a violation of any applicable laws or where the information is necessary for providing services.

The Customer/User may write to The Company at, [info@lightfinance.com](mailto:info@lightfinance.com) The Company will respond to the Customers/Users request within 10 days.

## **DATA RETENTION**

Customer/User information will be retained as may be defined by the company. If the Customer/User wishes to cancel its account or requests that the Company no longer uses its information to provide services, the Customer/User may contact the Company at [info@lightfinance.com](mailto:info@lightfinance.com) The Company may retain and use Customer/User information as necessary to comply with its legal obligations, resolve disputes, and enforce its agreements or for other business purposes.

The Company has a defined a record retention period as five (05) years from the date of last processing of your information. All deletion of Information will happen within a reasonable period {no later than ninety (90) days} after expiry of the retention period. All physical data will be disposed of by shredding or otherwise making unreadable confidential records in accordance with applicable laws. All electronic data will be disposed of in a responsible manner and in compliance with applicable laws and internal procedures and applicable laws including Master Directions/Directions/Guidelines/Guidance issued by Reserve Bank of India, with

reference to provisions of Prevention of Money Laundering (Maintenance of Records) Rule, 2005 (PML Rule, 2005) as amended from time to time.

## **CHANGES TO PRIVACY POLICY**

In the event the Company modifies this Privacy Policy, the same will be updated on the Website. The Customers/Users are encouraged to periodically review this page for the latest information on its privacy practices. The revised Privacy Policy shall bind the Customer/User and it is his/her sole responsibility to check the same from time to time. The Customer/User acknowledges that no knowledge of the revised Privacy Policy shall not be a defence in any proceedings with regard to the Privacy Policy.

## **SEVERABILITY**

The Company has made every effort to ensure that this Policy adheres with the applicable laws. The invalidity or unenforceability of any part of this Policy shall not prejudice or affect the validity or enforceability of the remainder of this Policy.

## **NO WAIVER**

The rights and remedies available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. It may be waived only in writing. Delay in exercising or non-exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.

## **GOVERNING LAW OR DISPUTE RESOLUTION**

This Policy shall be governed by and construed in accordance with the laws of the Republic of India and subject to the provisions of arbitration set out herein, the courts at Ahmedabad shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.

If any dispute arises between The Company and the User in connection with or arising out of the validity, interpretation, implementation, or alleged breach of any provision of the Policy, such dispute shall be referred to and finally resolved by arbitration in accordance with the Indian Arbitration and Conciliation Act, 1996 for the time being in force, which rules are deemed to be incorporated by reference in this clause.

The language of the arbitration proceedings and of all written decisions and correspondence relating to the arbitration shall be English.

## **FOREIGN JURISDICTION**

The Company makes no representation that the content contained on the Website is appropriate or to be used or accessed outside of the Republic of India. If the Customers/Users use or access the Website from outside the Republic of India, they do so at their own risk and are responsible for compliance with the laws of such jurisdiction.

## **COMPLAINTS/CONCERNS**

In accordance with the relevant provisions of the Information Technology Act, 2000 and Rules and RBI Guidelines on Digital Lending dated Sep 02, 2022 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 the Company's Terms of Use, Privacy Policy and other polices or questions will be as per the Grievance Redressal Policy published on the Website:

The Link to Grievance Redressal Policy is <https://www.lightfinance.com/wp-content/uploads/2024/07/Grievance-Redressal-Policy.pdf>

## **REVIEW OF THE POLICY**

The Policy will be reviewed at intervals as and when considered necessary by the Senior Management/Board of the Company.