



Privacy Policy

of

HDB FINANCIAL SERVICES LIMITED

[CIN: U65993GJ2007PLC051028]

(Last reviewed on July 15, 2026)

Introduction

HDB Financial Services Limited ("HDBFS", "we", "us", or "our") is committed to protecting and respecting your privacy. This Privacy Policy ("Policy") explains how we collect, use, disclose, store, secure, retain, and dispose of your Personal Information across all our business operations and interactions, including through our websites, mobile applications, physical branches, customer service channels, electronic communications, third-party platforms, and during our interactions with customers, employees, job applicants, vendors, business partners, visitors, and other individuals who engage with HDBFS through online or offline channels.

For the purpose of this Policy, "Personal Information" means any information relating to an identified or identifiable natural person ("Data Principal"), whether directly or indirectly, including information such as name, identification number, contact details, financial information, location data, online identifiers, or any other information relating to the physical, physiological, genetic, mental, economic, cultural, or social identity of such individual.

Who is covered by this Policy?

This Policy applies to the Personal Information of our customers (existing and prospective), business partners, vendors, visitors, employees (current and former), trainees, interns, contractual staff, job applicants, and other individuals whose Personal Information is processed by HDBFS.

This Privacy Policy applies to all products, services and/or business functions and activities of HDBFS, including but not limited to loans, , insurance products, credit assessment, collections, distributions, cross-sell products, agency services, and other related services and offerings (collectively "**Product(s)**"). It applies to all interactions with HDBFS, whether conducted online or offline, directly or through authorised representatives, intermediaries, agents, consultants, service providers, or other third parties acting on behalf of HDBFS.

This Policy also applies where you interact with us as an authorised signatory or authorised person or representative of a non-individual applicant/ customer/ user of any our Products or services.

Your Products' terms and conditions will cover specific matters in addition to this Privacy Policy and this Privacy Policy does not limit any of those specific matters or any other consent that you may have given or may give to or for the benefit of HDB Financial Services Limited. Therefore, please also read such specific terms and conditions in relation to the Products and such other consents, wherever applicable.

For the purposes of this Privacy Policy, the following words and expressions used herein, shall have the following meanings respectively:

"HDB Financial Services" or "we" or "our" "us" or "HDBFS" would include HDB Financial Services Limited.

"Representative" means any employee, official, representatives, any third party service provider, agents, or contractors, etc.

"Specified Purposes" shall collectively mean, credit assessment, risk assessment, risk analysis, obtaining credit information reports, scores, scrubs, fraud checks, fraud detections,

fraud prevention, detecting and preventing crime including crime/ terror funding, detecting malpractices or discrepant documents or information, prevention of misuse, assessment of credit worthiness, financial standing, due diligence, background check, physical and other inspections, verifications, obtaining any reports for any of the above, KYC/ AML checks, customer service, monitoring, collections, default detection, default prevention, default investigation, recovery, any legal proceedings, actions, enquiries, investigations, pursuing any remedies, enforcing rights, reporting including credit reporting, KYC reporting, default reporting, filing, perfections etc., whether any of these are undertaken internally or through any Processing Entity or through a combination of multiple options.

“You” or “Your” would mean Customers, prospective customers, or other user of services of the HDBFS, employees (current and former), trainees, interns, contractual staff, job applicants, and other individuals whose Personal Information is processed by HDBFS..

By accessing or using our website <https://www.hdbfs.com> or HDB mobile applications or otherwise by providing your information, you will be deemed to have read, understood and agreed to the practices and procedures outlined in this Privacy Policy and consequently enable us to process your Personal Information which is collected during your interaction with HDBFS in accordance with the terms & conditions of this Policy.

Since our website may contain hyperlinks to third-party websites or Services, this Privacy Policy applies solely to HDBFS and does not extend to the privacy practices of such third-party websites or features linked from our platform. We do not control these external sites and are not responsible for their content, privacy policies, or practices. We strongly encourage you to review the privacy policies and notices of these third-party websites or Services that you visit before sharing any Personal Information.

Privacy Principles Governing the Processing of Personal Information

At HDBFS we uphold the following privacy principles to ensure that your Personal Information is processed lawfully, fairly, and in a transparent manner:

- **Collection of Relevant Data:** We collect your Personal Information solely for lawful purposes that are clear, specific, and necessary for delivering financial products and Services tailored to your needs. We do not collect any Personal Information that is excessive or irrelevant.
- **Use Limited to Specified Purposes:** Your Personal Information is used strictly for the purposes that are informed to you at the time of its collection or as consented by you which may include without limitation to, providing the Services or products requested by you, enhancing customer experience, personalizing content, fulfilling contractual or legal obligations, conducting analytics, ensuring system security, performing internal audits, and improving our Services or operations. We do not process your Personal Information for any purpose that is incompatible with the originally Specified Purpose, unless you provide fresh consent or such processing is permitted by applicable law.
- **Data Sharing with Safeguards:** Your Personal Information is shared only with our authorized agents and verified third-parties subject to applicable laws and with adequate contractual safeguards.

- **Legally Mandated Disclosures:** Your Personal Information may be disclosed to government authorities, regulatory bodies, law enforcement, or judicial entities only when required under applicable law or pursuant to valid legal processes. While disclosing your Personal Information for the fulfilment of a legal requirement, we ensure that such disclosures are lawful, necessary, and proportionate.
- **Accuracy and Up-to-Date Records:** We strive to ensure the accuracy and completeness of the Personal Information we maintain. You, as a Data Principal, have the right and responsibility to inform us of any updates or changes so that we may fulfil our obligation to ensure data accuracy.
- **Data Security and Confidentiality:** We implement robust technical and organizational measures to ensure the security, confidentiality, and integrity of your Personal Information against unauthorized or unlawful processing, accidental loss, destruction, alteration, or damage. In addition to technological safeguards, we maintain strict internal policies and procedures governing how your Personal Information is accessed, handled, and shared by our employees and authorized vendors, third-parties, and service providers.
- **Controlled Access and Responsible Processing:** All employees, group entities, and third parties processing your data are contractually bound to maintain confidentiality and may only access your data for certain legitimate uses allowed under applicable law.

What Information About You Do We Collect

We collect, process, and store different types of Personal Information based on your interactions with our Services, platforms, and offerings. These categories of Personal Information may include, but are not limited to, the following:

➤ Identity & contact information

This includes without limitation to your:

- Name, address, signatures, biometric data, age, date of birth, copies of identity cards (ID), contact details including email id and phone number, address, previous names, maiden names, marital status, information about relatives and nominee, medical condition, domicile, origin, citizenship, nationality, residence, any legal or other identifiers like Permanent Account Number (PAN)/ Taxpayer Identification Number (TIN)/ Aadhaar/ National ID/CIN/GST Number/ Social Security Number/ or its equivalent, photograph, gender, biometric data used for identification or authentication
- Data that identifies (whether directly or indirectly) a particular individual, such as information you provide on any forms, surveys, online applications or similar online fields.
- Demographic information that you provide and aggregated or de-identified Data.

➤ Financial and transactional data

Such information covers:

- Bank account details, investments history, credit/debit card details, prepaid payment instrument details, any other instrument/ modality/ function details, UPI or VPA, income details, repayment history and patterns..
- Employment / occupational information.
- Residential status under banking, general and tax laws.
- Spending/saving/investing/payments/receipts/borrowing history.
- Risk profile, financial objectives, financial knowledge and experience, preferences and any other information to assess the suitability of the Products to you.
- Information collected when you make or receive payments.
- Other information such as information relating to occupation and financial situation such as employer's name and address, if self-employed, type of account, and nature and volume of anticipated business dealings, income proof, bank statements, income tax returns, salary slip, contract of employment, passbook, expenditure, assets and liabilities, source of wealth and signature.
- Data that is collected when you make financial and non-financial transactions. Such Data may include information associated with the transaction such as amount sent or requested, amount paid for Products or merchant information, including information about any funding instruments used to complete the transaction.

➤ **Information you provide about others or others provide about you**

- If you provide information or data about someone else (for example, information or data about a spouse or financial associate provided during the course of a joint application with that person), or someone shares information about you, may be added to any Data that is already held about you and can be used in the ways described in this Privacy Policy.
- We may obtain your Personal Information from third-party sources where such collection is permitted under applicable law or based on your consent, where required. These sources may include business partners, service providers, publicly available sources, social media platforms, marketing partners, and other third parties, as appropriate.
- Information including Data from credit information companies/ credit reference agencies, risk management and fraud prevention agencies, national and government databases.
- Data of authorised signatories or authorised persons or representatives of non-individual applicants/ customers/ users of any services, whether direct or indirect.

➤ **Information from online activities**

- Information about your internet activity is collected using technology known as cookies, which can often be controlled through internet browsers. For detailed information on the cookies used and the purposes for which they are used, see our [Cookie Policy](#), which is available on our website.
- Your digital and electronic devices where various checks are performed are designed to ascertain and verify your residency to ensure we meet our regulatory obligations. These checks include identifying and collecting your location (with your specific permission) and the IP address your device connects from and the collection of information about your use of the website or mobile app (including device type, operating system, screen resolution, and the way you interact with us).

- Information about your Internet browser, IP address, information collected through other digital tracking technologies such as web beacons, IP/MAC addresses, OS information, app logs, and telemetry data gathered during digital interactions.
- Unique device identifier such as International Mobile Equipment Identity (IMEI) number, technical usage data, contact lists (in some cases where specific permission is obtained), technical data about your computer and mobile device including details regarding applications and usage details.
- Information such as your fingerprint, etc. that you choose to provide to us. We will not collect your biometric information without your consent.
- Generation and storing password or PIN in encrypted form. Information about how you use our services clicks, page views, session duration, geolocation, search activity, and engagement patterns for analytics.

➤ **Other Personal Information**

- Information in relation to data access, correction, restriction, deletion, porting requests and complaints.
- CCTV images and Data at our branches and offices for the purposes of security, fraud prevention, crime prevention and detection, employee and visitor safety, investigation of incidents, and where applicable to comply with applicable laws and regulatory requirements, including directions issued by all regulatory and legal authorities.
- Conversations during meetings/calls/correspondences/discussions with HDBFS staff which will be recorded for customer service, employee training and quality assurance, dispute resolution, and regulatory requirements.
- Social relationships detail such as your father's name, spouse's name and mother's name;
- Behavioural details as to how to utilise our Products, offers etc., your browsing actions, ,online activity, page views, session duration, geolocation, search activity, and engagement patterns for analytics.;
- Records of correspondence and other communications with you, including email, telephone conversations, live chat, instant messages and social media communications containing information concerning your grievances, complaints and dispute.
- Any other information, Data or records which you may consent to be collected or used.

Please Note: Any Personal Information that is publicly available or has been made publicly available by the Data Principal or by any other person under a legal obligation shall continue to constitute Personal Information but its processing may be carried out in accordance with the applicable provisions and exemptions under the Digital Personal Data Protection Act, 2023 and other applicable laws.

➤ **Processing Children's Data**

Our Services are not directed to children under the age of 18, and we do not knowingly collect Personal Information from minors. If it is discovered that data has been collected from a minor without verifiable parental or guardian consent, we shall take immediate steps to delete such information. Parents or guardians may contact our Data Protection Officer at dpo@hdbfs.com and/or customer.support@hdbfs.com to request the erasure of such data.

Any of the aforesaid data (whether personal data or information), information, know your customer (KYC) related data, any derivative thereof ("Derivative Data") like any credit scores or behavioural projections, profiling, analytical results, reports (prepared by us or others) including through any algorithms, analytics, software, automations, profiling etc., and whether

such derivative is from the information collected from you or in combination with any other information sourced from any other person, database or source whether by us or others, shall collectively be referred to as “Data” and any part of the process relating to arriving at the Derivative Data as above, whether through internal or external sourcing, shall be referred to as “Derivation”.

When and how your Personal Information is collected

We may collect and use your Personal Information when you provide it to us directly or indirectly, including when you apply for, enquire about, or use our Products or services; communicate or otherwise interact with us through any online or offline channel or where your Personal Information is shared with us by an authorised representative, intermediary, employer, business partner, service provider, or any other person in connection with a transaction or service involving you. We collect such Personal Information only for lawful purposes and in accordance with applicable data protection laws.

- **Direct Collection:**

We collect your Personal Information directly from you when you interact with HDBFS through various online or offline channels, including but not limited to:

- Submission of the Data to us including when you ask for certain Products or when you use the Products or during the course of transactions.
- Application for a loan or any other product or service offered by HDBFS, including through our website, mobile application, branch, sales representative, or other onboarding channels, where you may provide information such as your name, contact details, identification documents, financial information, and other information required to process your request.
- Completing application forms, surveys, feedback forms, or other data collection forms, either online or offline.
- Contacting our customer service through telephone calls, emails, chat, branch visits, grievance redressal channels, or other communication channels.
- Uploading or submitting KYC documents, income proof, address proof, photographs, or other supporting documents required for onboarding, verification, or servicing.
- Using device-specific features, such as location services, camera access, biometric authentication, or push notifications, where such permissions are enabled by you and, where required, with your consent.

Personal Information collected directly from you with your knowledge and, where applicable, with your express consent, and are processed only for lawful purposes that are clearly communicated to you.

- **Automated Collection**

We use automated tools to capture data when you interact with our website, mobile application, or other digital platforms. This includes:

- **Cookies, tracking pixels, and beacons:** Used to authenticate sessions, prevent fraud, measure usage patterns, and enhance site/app functionality. We provide cookie consent mechanisms in compliance with DPDP Act and the Rules framed thereunder. For more details on such digital tracking technologies, please visit our [Cookie Policy](#).
- **Server and transaction logs:** This includes IP address, device/browser identifiers, session timestamps, login attempts, OTP usage, and failure/error logs for fraud monitoring and audit trails.
- **Mobile telemetry and analytics:** Captures app usage patterns, screen flow, crash logs, operating system version, mobile carrier data, and screen resolutions to optimize performance and security.
- **Third-party integrations:** Data passed through payment gateways, e-signature providers, or OTP validation services may result in limited automated data capture under secure and encrypted channels.

These tools are configured to minimize Personal Information wherever possible and are used only for the purpose of certain legitimate uses and maintaining compliance with applicable laws.

- **Third-Party Collection:**

In accordance with financial regulations and contractual arrangements, we may receive or collect your data from third parties including:

- **Regulated entities:** Including credit information companies, Aadhaar-based eKYC, NSDL/CDSL, CKYC Registry, and DigiLocker for document verification, subject to your prior consent or regulatory mandate.
- **Employer or Corporate Partner:** Where you are part of an employer-sponsored financial product (e.g., payroll-linked loans, group insurance, NPS), your employment and identification details may be shared by your employer.
- **Affiliates and Group Companies:** If you use products or Services offered jointly with our group companies and affiliates, your information may be lawfully shared internally, for risk assessment, servicing, or cross-selling (with consent, where applicable).
- **Channel Partners and Business Correspondents:** Includes DSAs, partners, or aggregators who assist in onboarding, servicing, or distributing our financial products.
- **Customer Referral Programs:** We may receive limited Personal Information from exiting customers who refer prospective customers under HDBFS's referral program or incentives. We will process such Personal Information in accordance with applicable laws
- **Account Aggregators and Consent Managers:** If you authorize sharing of your financial information via an Account Aggregator ecosystem or consent managers, data may be shared with us securely for the purposes you approve.
- **Publicly Available or Commercial Sources:** This includes government portals, electoral rolls, publicly available information on social media, or commercially procured databases, for verification, onboarding, or risk profiling.

Every such third-party collection is done in accordance with applicable laws, based on notice, consent, or other legal grounds as prescribed under applicable laws and relevant RBI/SEBI/IRDAI guidelines.

By accepting this Privacy Policy or by applying for or using any Product, you agree that any person who submits any Data or part thereof to us or from whom we source the same (including Derivation), shall be deemed to have been authorised by you to submit such Data to us and you hereby further authorise the processing of any such Data by us or for us, for any of the purposes mentioned in this Privacy Policy.

You represent to us that you are above the age of 18 and are in contracting capacity to access our platform and share your Personal Information with us.

How we Use Your Personal Information

We collect and process your Personal Information only for lawful purposes and in a fair, transparent, and necessary manner in accordance with applicable laws and regulations. These purposes include, but are not limited to:

- To provide lending services, open and manage accounts, verify identity through KYC/eKYC (including Aadhaar/PAN/CKYC), validate digital signatures, and authenticate financial or non-financial transactions.
- To evaluate you for various products and services of the HDBFS and referred products, checking credit score and other credit information, for sharing the information with credit information companies, credit and risk analysis, obtaining any reports, credit information, scrubs, for assessing and undertaking or evaluating financial standing, fraud check, fraud probability, reference checks, due diligence, inspections, etc. including from or through any credit information companies, bureaus, fintech entities or service providers.
- To provide and improve our digital lending and mobile applications which includes maintenance, error detection, data backups, risk mitigation, IT troubleshooting, and network security operations, in accordance with regulatory guidelines.
- To comply with obligations under laws and maintain audit trails mandated by regulators. This includes disclosures to courts, enforcement agencies, or financial regulators under due process.
- To customize product offerings, send targeted SMS/email/push notifications, deliver pre-approved loan offers, and serve interest-based advertising based on your preferences, transaction history, consent status, or eligibility. Our marketing communications are always subject to opt-out rights.
- To analyze service usage patterns, monitor customer satisfaction, improve customer journeys, and develop internal staff skills including use of anonymised or aggregated data for risk scoring, lead generation, or query resolution.
- To support access to partner-driven offerings and cross-sell products such as digital product loans, health/life insurance, and credit bureau-linked services, which are

always subject to your consent or contractual agreement with us or the third-party provider.

- To conduct customer surveys, feedback experiences, contests, and community initiatives. This may involve contacting you for invitations, updates, or acknowledgments regarding your participation.
- To inform you about important information regarding our Products, changes to terms, conditions, and policies and/or other administrative information and where processing is necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract. To take actions that are necessary in order to provide you with the Products (performance of a contract), for example, to make and receive payments.
- To detect, investigate, and prevent unauthorized access, fraudulent transactions, data breaches, identity theft, and money laundering. This includes use of AML software, fraud management systems, watch lists, and coordination with law enforcement authorities.
- To improve our Products and services, understand customer preferences and usage patterns, develop analytical models, enhance customer experience, conduct research and analytics, and design, test, validate, or improve new products, services, technologies, and business processes.
- Where necessary, we may share Personal Information with our service providers, technology partners, consultants, vendors, or other authorized processors for testing, proof-of-concept (PoC), pilot implementations, system integration, validation, or service improvement purposes. Such processing shall be limited to the extent necessary for the Specified Purpose and shall be carried out under appropriate contractual, technical, organisational, and security safeguards in accordance with applicable law.
- Wherever feasible, HDBFS will use anonymized, de-identified, masked, or synthetic data for the aforesaid activities. Where the stated purpose cannot reasonably be achieved using such data, or where Personal Information is necessary and permitted under applicable law, HDBFS may process Personal Information, subject to appropriate contractual, technical, organizational, and security safeguards.
- For any other purpose in relation to the Services provided by HDBFS or which are incidental and necessary to any of the aforesaid purposes.

Please Note: HDBFS may engage with any Processing Entity, for any of the aforesaid purposes or part thereof for any incidental or ancillary purposes, and may accordingly share Data with any of them and allow them to further process/ share the same, for the said purposes.

Legal Bases for Processing Your Personal Information

We process your Personal Information based on lawful grounds as outlined below:

- **Consent**

We seek your express consent for specific data processing activities that are not essential to the core functioning of our Services. These include sending marketing communications, cross selling, conducting behavioural profiling for product recommendations, enabling optional features such as contests, loyalty programs, or surveys, and utilising digital tracking technologies for personalised content or advertisements. We will ensure that such consent is always clear, specific, informed, obtained through your affirmative action, and may be withdrawn by you at any time without affecting the lawfulness of prior processing.

- **Certain Legitimate Uses:**

We are mandated to collect, store, and process certain Personal Information in order to comply with statutory and regulatory obligations imposed by financial regulators and law enforcement agencies. This includes customer due diligence under the Prevention of Money Laundering Act (PMLA), Know Your Customer (KYC) norms, reporting obligations under applicable laws, compliance with taxation, and any lawful instructions issued by courts, law enforcement agencies, government authorities, or regulatory bodies in India.

We may process Personal Information for other legitimate uses where such processing is reasonably expected by you as part of our services. These purposes include fraud detection and prevention, cyber incident response, network and information security, internal audits, research and analytics using aggregated or de-identified data, grievance resolution, quality control, and employee training. All such processing is subject to appropriate safeguards to ensure your privacy is not harmed or overridden.

In addition, we may process Personal Information of our employees, trainees, interns, contractual staff, and job applicants for recruitment, onboarding, employment administration, payroll, employee benefits, leave and attendance, employment and labour laws, and other employment related purposes permitted under applicable laws.

Who do we share your information with?

HDBFS is committed to maintaining the confidentiality and integrity of your Personal Information by limiting the collection, use and sharing of your Personal Information on a need-to-know basis to deliver better service to you. We do not disclose or share your Personal Information with any third party unless such disclosure is necessary to fulfil lawful, contractual, regulatory, or operational obligations, as outlined below. HDBFS may disclose or share your Personal Information when necessary to:

- provide, operate, or improve our Services and financial products offered to you, including through our group companies and affiliates;
- comply with applicable laws, regulatory directions, court orders, or enforcement agency requirements;
- protect and defend the legal rights, interests, or property of HDBFS, its affiliates, group companies, employees, or customers;
- enforce our terms and conditions or resolve disputes; and
- protect the interests, safety, or rights of HDBFS, its clients, stakeholders, or other persons, including the detection and prevention of fraud or financial crime.

To facilitate the above purposes, your Personal Information may be shared with such third parties, who are contractually obligated to process the data in accordance with applicable laws. These third parties include:

- Authorised service providers, vendors, cloud service providers, data processors, agents who perform services for us and help us operate our business, customer support operators, marketing and communication partners, data analytics firms, logistics providers, and document management services;
- Financial partners co-lenders, co-originators, collaborators, payment gateways, and insurance companies, and persons with whom HDBFS may have a tie-up for any Products.
- With any person/s involved in Derivation
- Other companies to bring you co-branded services, products or programs;
- Successors, assignees, and reorganized entities to whom we may transfer or assign our rights and/or obligations under any agreement, or in connection with any business restructuring, merger, sale, acquisition, transfer of business, or similar transaction. In such cases, your Personal Information will continue to be processed for the same purposes originally consented to or communicated to you, and the recipient will be contractually bound to maintain equivalent standards of data protection as mandated under applicable laws.
- Other third parties to comply with legal requirements such as the demands of applicable warrants, court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties. (in these scenarios we may share your Data without obtaining your consent or intimating you further we will have no control over how such Data is further processed by such authorities, persons etc.)
- Group companies and affiliates for operational continuity, shared infrastructure, joint service offerings, or business support functions.
- We may share your Personal Information, without obtaining your consent or without intimating you: (a) with governmental, statutory, regulatory, executive, law-enforcement, investigating or judicial/ quasi-judicial authorities, departments, instrumentalities, agencies, institutions, boards, commissions, courts, tribunals, who ask for such Data including by way of an order, direction, etc.; or (b) with any person, where disclosure is necessary for compliance of any legal or regulatory obligation. Wherever your Personal Information is shared as above, we will not have control over how such Data is further processed by such authorities, persons, etc. (both under 'a' and 'b' above).
- Credit information companies, bureaus, fintech entities or service providers for the purposes of obtaining any reports, credit scores, credit information, scrubs, financial standing, fraud check, fraud probability, reference checks, due diligence, inspections, risk analysis etc.

Please Note: The Data may also be shared by any of the aforesaid entities/persons with their service providers, consultants, agents, subsidiaries, affiliates, co-branded

entity/partner, distributors, selling/marketing agents, any partners, fintech companies other players/intermediaries in any ecosystem in which HDBFS is a part, collaborators, co-lenders, co-originators, merchants, aggregators, lead generators, sourcing entities, clients, customers or other persons with whom we have a tie-up or contract for any products or services etc. for any of the aforesaid purposes or any purposes incidental or necessary thereto. Any person or entity with whom the Data or any part thereof is shared by us or further shared by any of them, for any of purposes under this Privacy Policy, shall be referred to as a **“Processing Entity”**. [Wherever the Data is shared with any Processing Entity (with whom we have direct contract), we will through such contracts restrict the processing by them of such Data for the aforesaid purposes.]

A current list of these third parties with whom your data may be shared is available in [Third Parties List](#).

Retention of Data, Destruction Protocols, and Erasure

- **Retention Principle:** We may retain your Personal information only for as long as required to achieve the purposes outlined in this Policy, including the provision of lending services, management of your account, the recovery of any outstanding amount(s), fulfilment of any other legal and regulatory obligation, resolution of concerns, or as required for the establishment, exercise, or defense of legal claims, and for the duration mandated under any contract or applicable law. . We may need to retain your Personal Information for a longer period where we need the information for certain legitimate uses for e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.
- **Specific Retention Periods:** In line with regulatory requirements and our internal policy, we adhere to the following retention timelines:
 - **Transactional and Loan Account Data:** Retained for **10 (years) years** after the conclusion of the contractual relationship or settlement of all dues, whichever is later, unless there is an ongoing legal dispute or proceeding, and may be archived thereafter if required by other laws.
 - **KYC and Customer Identity Data:** Retained for **10 (ten) years** after the termination of the business relationship or account closure, and may be archived thereafter if required by other laws.
 - **Service-related Correspondence:** Retained for **10 (ten) years** after resolution of the query or termination of services for audit and quality purposes.
- **Data Destruction Protocol:** Upon the expiry of the applicable retention period or upon a valid erasure request, we will ensure the secure archival or destruction of your Personal Information. Our protocols include:
 - **Secure Deletion:** Use of data sanitization techniques for digital data.
 - **Physical Destruction:** Secure destruction of any physical media containing Personal Information.
 - **Archival:** In legally mandated cases, data may be moved to a secure, isolated archival system with highly restricted access.
- **Right to Erasure & Withdrawal of Consent:** You may request the deletion of your Personal Information or withdraw your consent for processing at any time by submitting a written request from your registered email address to dpo@hdbfs.com and/or

customer.support@hdbfs.com. Detailed process for right to erasure/withdrawal of consent is mentioned under "Consent Withdrawal, Opt-Out and Preference Setting" of this Policy.

- **Data Localisation:** In compliance with applicable regulations, we store all Personal Information exclusively on servers located within the territory of India,

Cookies

"Cookies" are small pieces of text sent to your browser by a website that you visit. They help the website remember information about your visit to improve your browsing experience next time you visit the site. Our website uses cookies to help us personalize our Services for you, remember your preferences, understand how users are using our website, and help customize our marketing communication. Please read our [Cookie Policy](#) to know more about the cookies, the way we use them, and about how to opt-out.

Log Files

"Log files" are files that anonymously log actions that take place on a website. We may use log files to gather statistics about your browsing habits and to assess overall digital activity, including how many "hits" a particular web page is getting. Log files enable us to track interest in specific promotions, troubleshoot technical concerns, and provide content that may be of interest. We also use the log file entries for our internal marketing and demographic studies, so we can improve our websites, mobile apps, and in our emails we provide to customers and visitors. Log files are used internally only, are anonymous, and are not associated with any particular user, device, computer, or browser.

Security and Incident Management

a. Our Security Commitment: At HDBFS, we follow strict security practices and adhere to the standards prescribed by applicable law to safeguard your Personal Information. We implement and maintain comprehensive physical, security administrative, technical, and organizational security measures and use advanced tools and techniques like encryption, firewalls, and secure login systems to protect your Personal Information from unauthorized access, disclosure, alteration, and destruction. Our security framework is built on recognised industry standards and is designed to comply with applicable laws on privacy and data protection.

b. Security Measures: To uphold our commitment towards protecting your Personal Information, we use the the following security measures, which includes, without limitation to, the following controls:

- **Access Management:** We maintain strict logical access controls based on the principle of least privilege, robust authentication protocols, and regular review of access rights.
- **Encryption:** All sensitive data in our systems is encrypted both during transmission over networks and while at rest.
- **Network & System Security:** We protect our networks with firewalls, actively monitor all attacks, and apply periodic security updates.
- **Resilience:** Our systems are designed to ensure confidentiality, integrity, and availability of your Personal Information held by us.

- **Third-Party Management:** We contractually obligate all our third-party service providers that handle your Personal Information to implement same or equivalent security safeguards.

c. Security Incident Management: In the event of a data security breach, we have established procedures to:

- Promptly contain, assess, and remediate such incident.
- Notify the relevant supervisory authorities and, where required by law, affected individuals, without undue delay.
- Take steps to mitigate any potential adverse effects and prevent future occurrences.

d. Shared Security Responsibility: While we prioritize securing your Personal Information by adopting appropriate physical, technical, administrative, and organizational security measures, you also play a part in protecting your own information by:

- using strong, hard-to-guess passwords.
- never sharing your passwords or OTPs.
- Not using public or shared devices.
- Reporting to us right away if you have noticed any suspicious activity.

To ensure protection of you Personal Information at every stage, we regularly update our systems to stay ahead of evolving threats and our employees and partners are trained and equipped to protect such information.

Your Rights as a Data Principal

You have several rights regarding your Personal Information, which you may exercise by contacting us at dpo@hdbfs.com and/or customer.support@hdbfs.com:

- **Right to Access:** You can request details and a copy of the Personal Information we process about you.
- **Right to Correction:** If any information that we hold about you is inaccurate or incomplete, you may request prompt rectification.
- **Right to Erasure:** You may ask us to delete your Personal Information, subject to applicable legal or regulatory requirements.
- **Right to Withdraw Consent:** You may withdraw previously given consent for data processing, which however, may affect service availability.
- **Right to Nominate:** You may nominate an individual to act on your behalf in case of your death or incapacity, in accordance with applicable laws.

Please Note: These rights are not absolute. They are subject to compliance with applicable laws, regulations, contractual obligations, certain legitimate uses, and the need to establish or defend legal claims. Exercising certain rights such as erasure or withdrawal of consent may limit or impact our ability to offer you our Services or access to specific features.

Your Duties as a Data Principal

While exercising your data protection and privacy rights every Data Principal shall adhere to the following duties:

- **Compliance with Applicable Laws:** The Data Principal shall exercise their rights in accordance with the provisions of applicable laws in force. Any action taken in violation of such laws shall not be protected under the rights granted by such law.
- **Prohibition on Impersonation:** The Data Principal shall not impersonate another individual while submitting or supplying Personal Information for any lawful purpose, including the availing of any service or benefit.
- **Disclosure of Material Information:** The Data Principal must not deliberately suppress or misrepresent material information while providing Personal Information that is intended for official identification or documentation, including but not limited to identity cards, proof of address, or unique identifiers issued by the Government or its instrumentalities.
- **Responsibility in Grievance Filing:** The Data Principal shall not file false, frivolous, or misleading complaints or grievances with HDBFS or misuse grievance mechanisms.
- **Furnishing Authentic Information:** When requesting the correction, updating, or erasure of Personal Information, the Data Principal is required to submit only verifiably authentic and truthful information.

Consent Withdrawal, Opt-Out and Preference Setting

You have the right to withdraw your consent to the processing of your Personal Information at any time, subject to applicable laws. If you wish to do so, please submit a duly filled Consent Withdrawal Form using your registered email ID to: dpo@hdbfs.com and/or customer.support@hdbfs.com. Upon receipt and verification of your request, HDBFS will process the withdrawal promptly and in any case no later than 30 calendar days.

Please note that:

- Certain Personal Information may continue to be retained by HDBFS to comply with applicable legal, regulatory, contractual, or audit obligations.
- Withdrawal of consent may impact service delivery or restrict access to features or offerings that require such processing.
- You will be notified of any such limitations at the time of processing your request.
- The information that the consent was withdrawn and request sent to us shall also be retained as per applicable law.

In addition to consent withdrawal, you may also customize your data-sharing preferences or opt out of non-essential communications such as marketing messages, newsletters, analytics tracking) by:

- Adjusting settings through your user account or mobile app;
- Using the “Unsubscribe” or “Manage Preferences” link included in email communications;

- Contacting our Data Protection Officer or customer support team at dpo@hdbfs.com or customer.support@hdbfs.com.

How Your Personal Information Is Processed When You Use Our Digital Lending Platform

By applying for or accessing any lending product or service through our digital platform, you agree that your personal information will be collected, processed, and utilized for the following purposes, in accordance with applicable laws and your loan agreement:

- **Credit Assessment & Financial Obligations:** Your financial information is used to assess loan eligibility and determine suitable lending terms. Personal Information shared by you may be disclosed to third-parties such as recovery agencies and legal authorities in the event of delay if paying back the loan amount or default.
- **Credit Information Reporting:** Your loan activity including timely payments or defaults may be shared with registered credit information companies.
- **Automated Underwriting & Profiling:** Loan approvals, interest rates, and eligibility assessments may be made using automated systems that evaluates certain information about you such as your credit score, financial history, and transaction patterns.
- **Notifications & Communication:** In cases of late payments or account delinquency, we may send alerts or recovery communications via SMS, email, app notifications, or phone calls as per established norms and guidelines.
- **Marketing & Relationship Management:** Your Personal Information, including your usage patterns, transaction history, and relationship profile with us, may be processed to identify relevant products, Services, or promotional offers suited to your financial needs or preferences which may include pre-approved loans, insurance products, and credit upgrades. Such offers may be communicated via SMS, email, app notifications, or phone calls.
- **Permissions & Usage:** To securely provide Services, our mobile application may request access to certain device features. These permissions are activated only with your prior consent and can be managed via your device settings:

Permission	Purpose of Use
Camera	Capture KYC documents, identity verification selfies, and upload supporting media
Location	Geotag loan applications, prevent fraud, and meet regional compliance standards
Microphone	Enable voice interactions or video KYC during onboarding (if applicable)
Files & Media	Upload documentation such as ID proof, payslips, or signed agreements
Notifications	Deliver important alerts such as loan application status updates, repayment reminders, account activity notices, promotional offers (if opted-in), and service-related communications to keep you informed in real time

Device Information	Collect basic device identifiers (such as IMEI, OS version) to enhance security, prevent misuse, and comply with regulatory requirements.
Biometric Authentication (Fingerprint/Face ID)	Enable secure login, transaction authorization, and identity verification.

You may revoke these permissions at any time. However, certain functionalities may be dependent on mandatory regulatory requirements or specific product needs.

Updating Your Information

Keeping your account information up-to-date is very important. If you believe that your account information is incomplete or inaccurate, please contact us through channels available to you. The accuracy of the Data provided to us is essential, among others, for the provision of Products to you. It is therefore mandatory that you ensure the accuracy and completeness of all Data disclosed or shared. Without prejudice to any rights and remedies of HDBFS under any contract in this regard, you shall be able to review the Data that you had provided and correct or amend as feasible any such Data which you find to be inaccurate or deficient. Provided that HDBFS shall not be responsible for the authenticity of the Data supplied by you to us or any other person acting on behalf of us.

You may update your account information:

- Through your nearest branch – Locate branch near you
- By writing to us at **customer.support@hdbfs.com**

If you prefer, you may call or write to us at the telephone numbers and addresses provided on your account statements, or you may speak directly with a branch representative, or your designated relationship manager.

Changes / Update to This Privacy Policy

HDBFS reserves the right to modify/change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested to review the Privacy Policy periodically, to make sure that you are aware of any such changes. The changed Privacy Policy shall be effective as soon as it is published/posted/hosted on our website/respective Apps/platforms. If you use our website or Apps, platforms or make any application/request for any Product or use any Product or make any service requests for or during usage of any Product or if you use any functionality provided by or for us, such act of any of aforesaid uses shall by itself amount to your acceptance of the Privacy Policy with changes, if any.

This Privacy Policy shall be reviewed annually to ensure its continued relevance and effectiveness and shall also be updated at any time in response to changes in applicable laws, regulations, or business practices that necessitate such revisions.

This Privacy Policy shall be governed by the laws of India and any disputes arising out of or in relation to this Privacy Policy shall be subject to the jurisdiction of courts/ tribunals of Mumbai, India.

Disclaimer

Kindly note that HDBFS does not collect Personal Information about individuals except when such individuals specifically provide such information on a voluntary basis. Upon such voluntary disclosure of Personal Information, we may further verify, collate or receive information about you from publicly and commercially available sources (as permitted by law), which we may combine with other information we receive from you. We may also receive information about you from third-party social networking services or third-party application / websites, if you are already connected with those services. HDBFS shall, at all times, ensure to implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of your Personal Information and information as the same is of vital importance to HDBFS. At HDBFS, we are strongly committed to protecting the personal and financial information that you submit to us. However, please note that although we take reasonable steps to protect your information, no website, internet transmission, computer system or wireless connection is completely secure.

HDBFS shall ensure to safeguard the security and confidentiality of any Personal Information you share with us. Any of your personally identifiable information obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your Personal Information, HDBFS cannot warrant the security of any information you transmit to us through our online services / applications. By accepting this Privacy Policy, you accept that such transmission of your Personal Information is done at your own risk.

Contact Information and Grievance Redressal

If you have any queries on this Privacy Policy, or on the ways in which we process your data, or on your choices and your privacy rights, you may contact Data Protection Officer at dpo@hdbfs.com and and/or service representative at customer.support@hdbfs.com. We will make reasonable efforts to respond to your queries in accordance with applicable laws.

You may also write about your grievances with relating to this Policy, or the way your Personal Information is processed, or if you are not satisfied with the resolution provided for the queries raised by you by writing to customer.support@hdbfs.com or Call +91 44 4298 4541.

"HDB Mobile Applications Privacy Policy"

[Click here to view the app policy.](#)

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