



# **Privacy Policy**

**of**

**HDB FINANCIAL SERVICES LIMITED**

[CIN: U65993GJ2007PLC051028]

**September 15, 2022**

## Introduction

The Reserve Bank of India vide Press Release dated August 10, 2022 on Recommendations of the Working group on Digital Lending – Implementation has recommended that the Regulated Entities (REs) should ensure that REs and their Digital Lending Aps (DLAs) and Lending Service Providers (LSPs) engaged by them have a comprehensive privacy policy compliant with applicable laws, associated regulations and RBI Guidelines. In view of this, the Company is required to adopt a comprehensive Privacy Policy to address the concerns encompassing protection and dissemination of personal information along with protection of data privacy of borrowers, being on-boarded by the Company and by DLAs/LSPs engaged by them. This policy is applicable for digital lending including lending through website, online platforms and mobile apps of HDBFS and / or its lending service provider covering below details:

- a) Access and collection of personal information of borrower;
- b) Storage & maintenance of information;
- c) Use of personal information;
- d) Sharing of information;
- e) Restriction regarding storage of bio-metric data / collected in the systems
- f) Deletion / Erasure of Data; etc.

## Who is covered by this Policy?

All natural persons ("Visitors"), whose personal information is either collected/ received/ possessed/ stored/ dealt in/ handled by HDB Financial Services Limited (HDBFS/Company) / who visit the site [www.hdbfs.com](http://www.hdbfs.com) and provide information to HDBFS online / whose information is received / collected through / from any digital lending service provider's platform / application or otherwise.

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

**"Digital Platform(s)"** means mobile applications of the Company, online services, and other digital platforms through which the Company receives transaction data including data received from any company authorized digital lending service provider's platform / application, who is authorized by or associated with HDBFS.

**"HDB Financial Services" or "we" or "our" or "HDBFS"** would include HDB Financial Services Limited and service providers.

**"Personal information"** means any information that relates to a Visitors, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate or received from any third-party provider, is capable of identifying the person including but not limited to name, age, gender, address, email address, telephone number, domicile, Pan Number, nationality, date of birth, or account information, etc.

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

**"Use of our Digital Platforms"** would mean Visiting any Digital Platforms owned and/or controlled by the Company including to access your accounts, use our BOT service, conduct online transactions, etc.; viewing or clicking on our ads on third-party sites that re-direct you to our Digital Platforms; interacting with us on third-party sites including but not limited to WhatsApp, Alexa, Siri, Cortana, Google or any other social media platform, etc.

“You” or “Your” would mean Customers of the HDBFS and Visitors of the Digital Platforms or its service providers.

This Privacy Policy provides you with the details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. By sharing any information on Digital Platform or sharing information with the Representative to be uploaded on the Digital Platform, you expressly signify that you have read, understood and agree to be bound by this Privacy Policy. If you do not agree to the terms of this Privacy Policy (in whole or part), kindly do not share any information on Digital Platform or with Representative. By sharing any information on Digital Platform, you provide your express agreement and consent to all the terms and conditions as stated under this Privacy Policy and as may be amended from time to time.

❖ **Data we collect**

- "Personal data" refers to data that identifies (whether directly or indirectly) a particular individual, such as information you provide on our forms, surveys, online applications or similar online fields. Examples may include your name, previous names, postal address, email address, telephone number, domicile, nationality, PAN number, date of birth or account information, etc.
- "Anonymous information" means information that cannot reasonably be used to identify a particular individual. Examples may include information about your internet browser, IP address, information collected through tracking technologies, demographic information that you provide to us and aggregated or de-identified data.
- "Location information" means information that may be collected by certain mobile applications that identifies your physical location after taking one-time consent. This information may be collected from your mobile device's location-aware features when you request certain services that are dependent on your physical location.
- Other information such as information relating to your 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, with the conventional bank licensee, income proof, bank statements, income tax returns, salary slip, contract of employment, passbook, debit card/credit card details, expenditure, assets and liabilities, source of wealth, signature, as well as your other bank account details;
- Generation and storing password or PIN in encrypted form based on your request on the Digital Platform;
- Your photographs;
- 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, services, offers etc., your browsing actions, patterns and online activity;
- Records of correspondence and other communications between us, including email, telephone conversations, live chat, instant messages and social media communications containing information concerning your grievances, complaints and dispute;
- Personal data you provide to us about others or others provide to us about you;
- Transaction Data means Data we collect when you make financial and non-financial transactions. Data may include information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction, device information, technical usage data, and geo-location information.
- We do not collect your mobile phone resources such as file and media, contact list, call logs, telephony functions, etc. A one-time access can be taken from camera, microphone, location or any other facility necessary for the purpose of on-boarding / KYC requirements only with your explicit consent. We do not collect / store any biometric data unless allowed under existing statutory guidelines.

#### ❖ Use of personal data

- To personalise your Digital Platform experience;
- To respond to your enquiries and address your requests;
- To deliver marketing communications that we believe may be of interest to you;
- To inform you about important information regarding Digital Platforms, changes to terms, conditions, and policies and/or other administrative information;
- To offer you our products or services which you may have applied for or shown interest in;
- To allow you to apply for our products or services;
- To evaluate your eligibility for our products or services;
- To perform our obligations under KYC norms (e.g. sharing your information with third parties to verify details you have provided to us like your identity, to authenticate you and verify your information);
- To allow you to participate in surveys and other forms of market research, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how personal information is used and shared;
- To perform activities such as data analysis, audits, usage trends to determine the effectiveness of our campaigns and as input into improving products and services and enhancing our Digital Platforms;
- To improve risk control for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal processes and law enforcement requirements;
- To allow you to utilise Digital Platform features by granting us access to information from your device when you request certain services;
- To use it in other ways as required or permitted by law or with your consent;
- To manage our relationship with you;
- To prevent or detect crime including fraud and financial crime;
- For security and business continuity and risk management;
- To protect our legal rights and comply with our legal obligations;
- For system or product development and planning, audit and administrative purposes;
- To enter into a contract with you or to take steps pursuant to your request prior to entering into a contract.
- To meet the legitimate interests to be pursued by us or by a third party.
- Evaluating 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, and for offering cross-sell services and products and services of the HDBFS.

#### ❖ Who do we share your information with?

- With any third-party service providers, vendors, data processors and/or agents who perform services for us and help us operate our business;
- Other companies to bring you co-branded services, products or programs;
- 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.
- Statutory and regulatory bodies and authorities including but not limited to the Reserve Bank of India or the Securities and Exchange Board of India (including central and local government) and law enforcement authorities and entities or persons, to whom or before whom it is

mandatory to disclose the personal data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunal.

- By using Digital Platform or by agreeing to transact with us, you agree to the above sharing of information during your relationship with us.

#### ❖ **Retention of Data**

- We may retain your Personal information for as long as required under applicable law or to provide you with services such as managing your account and dealing with any concerns that may arise or otherwise if required for any legal or regulatory requirements or for establishment, exercise or defence of legal claims or till the time as required under any contract, by applicable law.
- We may need to retain your information for a longer period where we need the information for our legitimate purposes for e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc. If we don't need to retain information after a period of time, we may destroy, delete or anonymise it as decided by us.

#### ❖ **Deletion / Forget of Data**

In case you intend to erase your Personal information then please write us to [customer.support@hdbfs.com](mailto:customer.support@hdbfs.com). On receipt of your request, we will delete your Personal information or forget the customer from our DLA, as long as the personal data is no longer required for legal / regulatory purpose of HDBFS. The right to forget/delete data only applies to data held at the time such a request is received. It does not apply to data that may be created in the future.

#### ❖ **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. We may use cookies to improve your experiences when visiting or using our Digital Platform. We may use cookies to anonymously track interests, and collect aggregate information when you use or visit Digital Platform. We do not use cookies to store or transmit any Personal Data.
- Temporary "session" cookies are also used to facilitate customer navigation within our Digital Platform during your visit. "Session" cookies are deleted once you close your internet browser. We may also use "persistent" cookies that are retained on your computer after your visit ends so we can identify your preferences and enhance your future visits to our Digital Platform.
- "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 the Digital Platform 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.

#### ❖ **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
- Through your nearest branch – Locate branch near you

- Write 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.

❖ **Consent**

By visiting any Digital Platform, you hereby consent to the collection and use of the information you disclose to HDBFS in accordance with this Privacy Policy, including but not limited to your consent for sharing your information as per this Privacy Policy.

❖ **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.

❖ **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 data 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.

❖ **Grievance Officer**

If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your information rights, please contact our Service representative at customer.support@hdbfs.com Call: +91 44 4298 4541