

## **PRIVACY POLICY**

Svakarma values the trust you place in it when you share Personal and/or Business Information with Svakarma including information relating to your business or enterprise. Svakarma has therefore developed a Privacy Policy (“**Policy**”) to help you understand the collection, use, disclosure, maintenance and transfer of such information by Svakarma Finance Private Limited, a private limited company incorporated under the Companies Act, 2013, with its registered office at 803, Floor 8, Lodha Supremus, Dr E Moses Road, Worli Naka, Worli, Mumbai, Mumbai City, Maharashtra (hereinafter collectively referred to as “Svakarma”).

This Policy is prepared in accordance with the terms of the Information Technology Act, 2000 and all rules framed thereunder, more specifically, Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011, under the terms of which Svakarma is required to publish its Privacy Policy for access or usage of Svakarma’s products, services, software, platform and website by you. Please read the terms and conditions of this Policy carefully, before accessing or using this website. By accessing or using the Svakarma website including its products and services, you agree to the terms of this Policy. If you are accepting this Policy on behalf of another person or company or other legal entity, you represent and warrant that you have full authority to bind such person, company or legal entity to these terms.

Our Policy describes the types of Personal and/or Business Information we collect, why and how we use the information, with whom we share it, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

This Policy describes Svakarma’s current data protection policies and practices and may be amended/updated from time to time. You can determine when this Policy was last revised by referring to the "Last Updated" date mentioned at the top of this page. Any changes to this Policy will become effective upon posting of the revised Policy on Svakarma’s website. We suggest that you regularly check this Privacy Policy to apprise yourself of any updates. Your continued use of Website or provision of data or information thereafter will imply your unconditional acceptance of such updates to this Policy

### **1. What information does Svakarma collect?**

#### **Personal Information:**

The Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 defines “Personal Information” as any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person. Therefore, for the purpose of this Policy, the term “Personal Information” shall include, without limitation, any and all information that you disclose to Svakarma and which can be used to uniquely identify or contact you or reasonably can be linked to information that identifies you. For example, including but not limited to:

1. Your Name
2. Your postal address
3. Your telephone and fax number
4. Your e-mail address or other contact information
5. Government-issued identification documents
6. Country or origin information
7. Contact information of colleagues, business partners and other people provided by you
8. Usernames and passwords to access Svakarma’s website

Svakarma Finance Private Limited

*Regd. Office:* 803, Lodha Supremus, Dr. E Moses Road, Worli, Mumbai- 400 018; T: +91 22 24974417/18

*Corporate Office:* 223, TV Industrial Estate, S.K. Ahire Marg, Worli, Mumbai-400 030; T: +91 22 6615 5100/01

CIN: U65999MH2017PTC302033|E: [info@svakarma.com](mailto:info@svakarma.com)| W: [www.svakarma.com](http://www.svakarma.com)



9. Information regarding your transactions on the website
10. Content such as photos, articles, comments provided by you
11. Your financial information such as bank account information or credit card or debit card or other payment instrument details
12. Internet Protocol address
13. Any other items of "sensitive personal data or information" as such term is defined under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data of Information) Rules, 2011 enacted under the Information Technology Act, 2000
14. Identification code of your communication device which you use to access the website or otherwise deal with any Svakarma entity
15. Any other information that you provide during your registration process, if any, on the Svakarma's website.

### **Business Information:**

In the course of accessing or using the Svakarma website, you may disclose certain information about your business. Business Information may include without limitation:

1. The name and address of your business entity
2. The Corporate Identification Number
3. Details of any shareholding, business processes, management and technology
4. Details of any mergers or acquisitions
5. Details of any loans or investments made by the business entity
6. Business contact information (such as job title, department and organization's name, statutory details, filings, identity and business proofs)
7. Any such other information which may or may not be publicly accessible.

Such Personal and Business Information may be collected, either manually or by automated means, with regards to services we provide including during the course of your registering as a user on the Svakarma's website or availing certain services offered on the website.

### **Non-Personal Information:**

Non-Personal Information means information that does not specifically identify an individual or business, but includes information from you, such as your browser type, the URL of the previous website you visited, your Internet Service Provider (ISP), operating system and your Internet Protocol (IP) address. Svakarma may also collect Non-Personal Information that you voluntarily provide, such as information included in response to a questionnaire or a survey conducted by Svakarma.

### **Public Records:**

Public Records are records that are created and maintained by government agencies or law enforcement authorities, and are open for public inspection, although such access may be limited to certain permissible purposes. For example, Svakarma may have access to documents uploaded by your business on the Ministry of Corporate Affairs website, including incorporation documents, compliance forms and annual return filings.

## **2. How does Svakarma gather your information?**

### **Information provided for Svakarma's services:**

Svakarma may collect information from you when you provide it to Svakarma to access its website or when you register for one of its products or services. For example, if you send an email or submit



information via a form on the Svakarma website, Svakarma may collect any Personal and/or Business Information or any other information you provide.

**Information from using cookies and similar technologies:**

Svakarma may also collect information from you about your preferences in using its services by using cookies and/or other methods. Svakarma may use cookies to monitor website usage including, without limitation, to provide useful features to simplify your experience when you return to the Svakarma website, like remembering your login ID and certain Personal and/or Business Information and to deliver relevant content based on your preferences, usage patterns and location.

**Information we collect automatically:**

There is certain information that we collect automatically as the result of your use of the Platform, or through the use of web analytics services. This information includes but is not limited to:

- The Internet Protocol (IP) address of the device from which you access the Platform (this can sometimes be used to derive the country or city from which you are accessing the Platform).
- The specific actions that you take on the Platform, including the pages that you visit, connecting your Facebook or Google+ account.
- The time, frequency and duration of your visits to the Platform.
- Your browser type and operating system.
- The nature of the device from which you are accessing the Platform, for example, whether you are accessing the Platform from a personal computer or from a mobile device.
- Your location data (e.g. GPS), calling history, contact list and messages when using Svakarma's Application.

**3. How does Svakarma use your information?**

- To capture, save, compile and analyze the user information required to perform credit and risk scoring models and establish identity and assess applications.
- To design and improve the products and services, customer relationship management processes to operate the business.
- To monitor metrics such as total number of views, visitors, traffic and demographic patterns.
- To carry out its contractual obligations entered into between Svakarma and the User.
- To conform to the legal requirements, compliance/reporting to administrative and judicial authorities, as may be required and to comply with regulatory guidelines.
- To protect and defend the rights or property of the website owners of Svakarma, or the users of Svakarma.
- To communicate with you to send order confirmations, respond to customer service requests, send marketing communications, and send account update notifications.
- To share the information with multiple financial institutions and other lenders for customization of offers and provision of services;
- To undertake research, troubleshooting, fraud and risk management and prevention of other criminal activity.
- To post and review your comments on our blog.
- We may also collect and use this information in other ways permitted by law. We will take utmost care to ensure that your personal information is not shared with the public and that your transactions on the Website are confidential. If we use any third parties for any of these transactions, we will also make sure that confidentiality is maintained. We may also provide personal information about our customers to other organizations. We will take reasonable care that any personal information we disclose to them is only used for the specific task we ask them to perform.



#### **4. Does Svakarma share your Information?**

Except as described in this Policy, Svakarma will not share your Personal and/or Business Information with other entities or individuals outside of Svakarma, unless it has received your express consent.

##### **Disclosure to Government authorities or as required by law:**

Svakarma may share your Personal and/or Business Information with Government authorities in response to subpoenas, court orders, or other legal process; to establish or exercise legal rights; to defend against legal claims; or as otherwise required by law. Svakarma warrants that such information will be disclosed only in accordance with applicable laws and regulations.

##### **Disclosure to third-party vendors/contractors:**

Svakarma may engage third party vendors and/or contractors to perform certain support services for Svakarma, including, without limitation, software maintenance services, advertising services, web hosting services, cloud telephony services, cloud-based support services and such other related services which are required by Svakarma to provide its services efficiently. Svakarma may also share information with credit bureaus, credit rating agencies and credit reference agencies, and, in the event of default, to debt collection agencies. These third parties may have limited access to your Personal and/or Business Information. If they do, this limited access is provided so that they may perform these tasks for Svakarma and they are not authorized by Svakarma to otherwise use or disclose your Personal and/or Business Information, except to the extent required by law.

##### **Disclosure to acquirers:**

Svakarma may disclose and/or transfer your Personal and/or Business Information to an acquirer, assignee or other successor entity in connection with a sale, merger, or reorganization of all or substantially all of the equity, business or assets of Svakarma.

#### **5. How does Svakarma secure my information?**

Svakarma considers the confidentiality and security of your information to be of utmost importance. It therefore uses industry standards, and physical, technical and administrative security measures to keep your Personal and/or Business Information confidential and secure and Svakarma will not share your Personal and/or Business Information with third parties, except as otherwise provided in this Policy. Please be advised, however, that while we strive to protect your Personal and/or Business Information and privacy, we cannot guarantee or warranty its absolute security when your information is transmitted over the internet into the Svakarma website. We use various security measures including, but not limited to:

##### **Passwords:**

Access to your online account on the Svakarma website is password protected and this helps to secure your account information. You are solely responsible for maintaining the confidentiality of that password. If you provide someone else with access to your password, they will have the ability to view information about your account and make changes through the Svakarma website.

Please note Svakarma's websites are not intended for children under the age of eighteen years without the permission of a parent or guardian. Please contact us to take appropriate action if you believe that a child has submitted personally identifiable information on or through our website without the consent and supervision of a parent or guardian.

#### **6. What are your choices?**

You have a choice about how Svakarma uses your Personal and/or Business Information to communicate with you, send you marketing information, and provide you with customized and



relevant content.

### **Communication Preferences:**

During registration and when availing services, you can set your email preferences with respect to receiving certain communications from Svakarma. In addition, all of Svakarma's newsletters and other general email marketing communications also include an "unsubscribe" opt-out link that you may use to ask that Svakarma discontinues such emails to you. However, you will not be able to opt-out of receiving administrative messages, customer service responses or other transactional communications.

### **Withdraw Consent:**

If you withdraw your consent for the use or disclosure of your Personal and/or Business Information for the purposes set out in this Policy, you may not have access to all of Svakarma's products and services and Svakarma may not be able to provide services to you efficiently.

### **User Discretion and Opt Out:**

You agree and acknowledge that you are providing your information out of your free will. Subject to certain exceptions prescribed by law and provided Svakarma can authenticate your identity, you can contact Svakarma at [customerservice@svakarma.com](mailto:customerservice@svakarma.com) or send mail

to Svakarma Finance Private Limited, 223, T.V. Industrial Estate, S.K Ahire Marg, Worli, Mumbai – 400 030 to:

- Access, verify, correct, update, amend, restrict, object to, or delete any Personal and/or Business Information Svakarma has about you.
- Review the information Svakarma retains, how it has been used, to whom Svakarma has disclosed such information to.
- Opt to transfer your personal data.
- Change preferences regarding how your Personal and/or Business Information is disclosed.
- Notify Svakarma if you do not want your data to be processed anymore.
- Notify Svakarma if you do not wish to receive further communication from Svakarma.

Svakarma will respond to such requests in reasonable time, which will be within the time limits established by the applicable law.

If you opt out, you should not visit any Svakarma website, use any services provided by Svakarma entities, or contact any of Svakarma entities. Svakarma may deny you access to its services offered on the website

## **7. Any Questions or Complaints?**

If you have any questions about Svakarma's Privacy Policy, you may contact Svakarma: Email at [customerservice@svakarma.com](mailto:customerservice@svakarma.com); or

Write to Svakarma at: SVAKARMA FINANCE PRIVATE LIMITED at 223, TV Industrial Estate, SK Ahire Marg, Worli, Mumbai - 400030.

In accordance with Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011, if you have any grievances or concerns about Svakarma's Privacy Policy or if you would like to make a complaint about a possible breach of privacy in relation to Svakarma's website, you may contact the Grievance Officer at [customerservice@svakarma.com](mailto:customerservice@svakarma.com).