



Home Plus Finance Private Limited (HPFL)

PRIVACY POLICY Version V2.0

Approving Authority	Board of Directors
Reviewing Authority	Compliance Department
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Policy Making Body	Compliance Department
Effective Date	24 th June 2024



Applicable To:

- Customers
- Prospective Customers
- Co-applicants
- Guarantors
- Website Visitors
- Mobile Application Users
- Employees handling customer information
- Loan Service Providers (where applicable)
- Business Correspondents
- Vendors and Service Providers handling personal information

VERSION HISTORY

Version	Date	Description	Approved By
1.0	01-02-2023	Initial Policy	Board of Directors
2.0	24-06-2024	Comprehensive revision incorporating RBI guidelines, Digital Personal Data Protection Act, 2023 and digital lending requirements	Board of Directors

PURPOSE OF THIS DOCUMENT

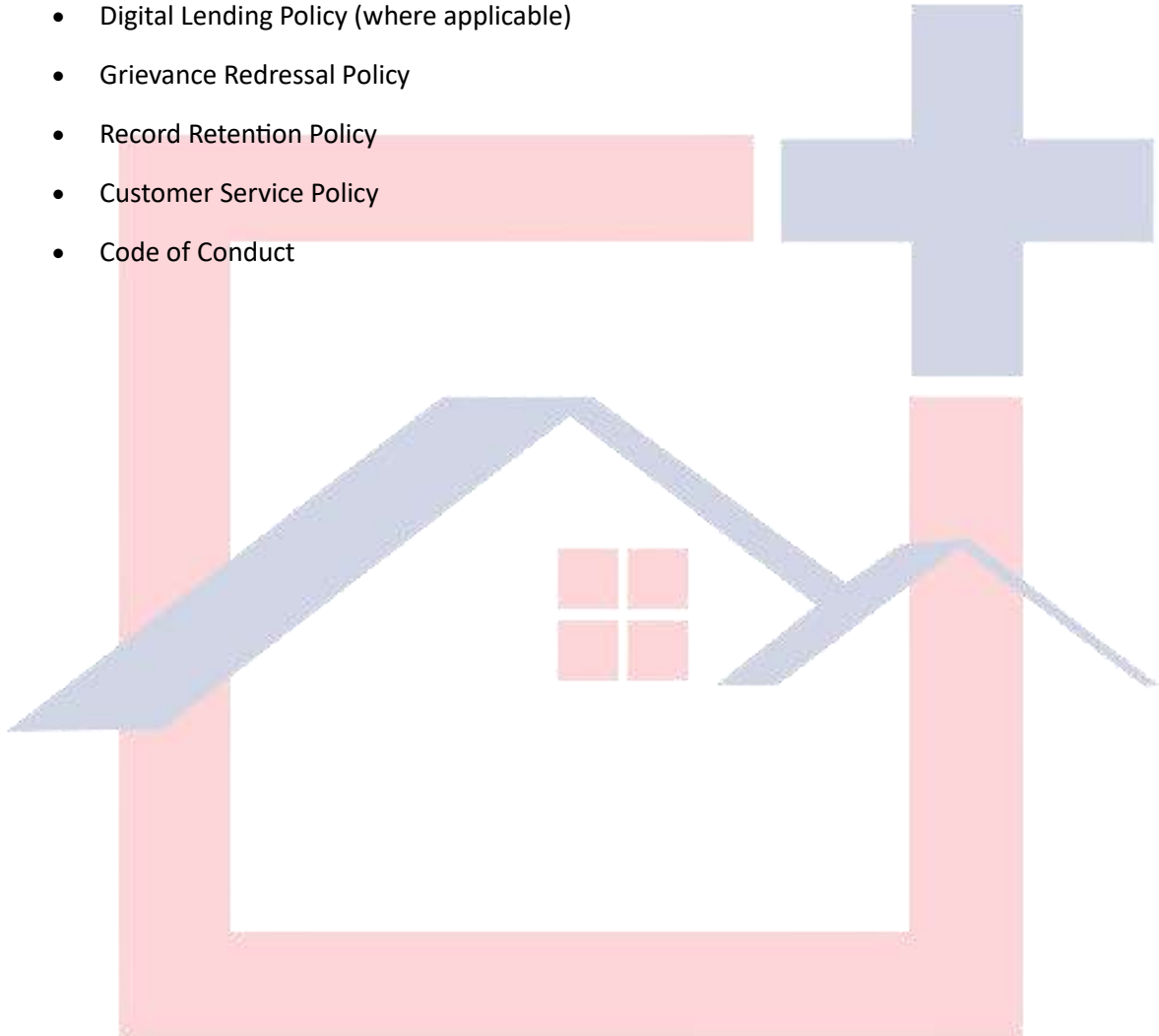
This Privacy Policy establishes the principles, responsibilities, standards and procedures governing the collection, use, processing, storage, disclosure, retention and protection of personal information by Home Plus Finance Private Limited ("HPFL" or the "Company").

The Policy reflects the Company's commitment to maintaining the confidentiality, integrity and availability of personal information entrusted to it by customers and other stakeholders. It also provides a transparent framework explaining how personal information is handled throughout the customer lifecycle.



This Policy shall be read in conjunction with the Company's:

- Fair Practices Code
- KYC & AML Policy
- Information Security Policy
- Digital Lending Policy (where applicable)
- Grievance Redressal Policy
- Record Retention Policy
- Customer Service Policy
- Code of Conduct





INTRODUCTION

2.1 Background

Home Plus Finance Private Limited ("HPFL" or the "Company") is committed to protecting the privacy, confidentiality and security of personal information entrusted to it by its customers, prospective customers, employees, business partners, vendors and other stakeholders.

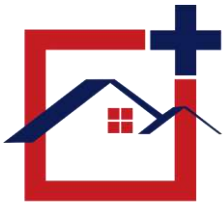
As a regulated financial institution, HPFL collects, processes and maintains personal information for the purpose of providing financial products and services, complying with applicable laws and regulations, managing operational risks and delivering an efficient customer experience. The Company recognises that personal information is a valuable asset and that protecting such information is fundamental to maintaining customer trust and confidence.

The Company is committed to ensuring that all personal information is processed in a lawful, fair, transparent and secure manner while respecting the privacy rights of individuals.

2.2 Commitment to Privacy

HPFL is committed to:

- Respecting the privacy of every individual whose personal information is collected or processed.
 - Collecting only such information as is necessary for legitimate business, contractual, legal and regulatory purposes.
 - Processing personal information fairly, lawfully and transparently.
 - Protecting personal information through appropriate administrative, technical and physical safeguards.
 - Preventing unauthorised access, disclosure, alteration, misuse or destruction of personal information.
 - Ensuring that personal information is retained only for as long as necessary in accordance with applicable laws and business requirements.
 - Providing customers with clear information regarding the collection, use and sharing of their personal information.
 - Continuously improving privacy practices in line with evolving regulatory requirements and industry best practices.
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2.3 Objective

The objectives of this Privacy Policy are to:

- a. establishes a comprehensive framework for the collection, use, storage, sharing and disposal of personal information;
- b. ensure compliance with applicable laws, regulations and regulatory directions governing privacy and data protection;
- c. protects the confidentiality and integrity of customer information throughout its lifecycle;
- d. promote transparency regarding the Company's information handling practices;
- e. defines the responsibilities of employees, service providers and other authorised persons who process personal information on behalf of the Company;
- f. establishes appropriate controls for managing privacy risks associated with physical records, electronic records and digital platforms;
- g. provides customers with information regarding their privacy rights and the manner in which such rights may be exercised; and
- h. strengthens customer confidence by ensuring responsible handling of personal information.

2.4 Regulatory Framework

This Policy has been formulated with reference to, and shall be read in conjunction with, the following, as amended from time to time:

- Reserve Bank of India Act, 1934;
- Companies Act, 2013;
- Digital Personal Data Protection Act, 2023;
- Information Technology Act, 2000;
- Reserve Bank of India Master Direction – Know Your Customer (KYC) Direction, 2016;
- Reserve Bank of India Scale Based Regulation (SBR) Directions;
- Reserve Bank of India Fair Practices Code;
- Reserve Bank of India Digital Lending Guidelines and related circulars, where applicable;
- Prevention of Money Laundering Act, 2002 and rules made thereunder;
- Any other applicable law, regulation, circular or direction issued by the Reserve Bank of India or any competent authority.



Where any provision of this Policy is inconsistent with any applicable law or regulatory direction, the applicable law or regulatory direction shall prevail.

2.5 Applicability

This Policy applies to all personal information collected, processed, stored, transmitted or otherwise handled by HPFL through any channel, including but not limited to:

- Branch offices;
- Corporate office;
- Website;
- Mobile applications;
- Digital lending platforms;
- Loan Service Providers (where applicable);
- Business Correspondents;
- Customer Care Centre;
- Call recording systems;
- Email communications;
- Physical application forms;
- Electronic application forms;
- Third-party service providers engaged by the Company.

This Policy applies to all directors, employees, consultants, contractual staff, interns, vendors, service providers and any other person authorised to process personal information on behalf of the Company.

2.6 Policy Statement

HPFL shall process personal information only for lawful and legitimate purposes and shall implement appropriate organisational and technical measures to protect such information against unauthorised access, disclosure, misuse, alteration, loss or destruction.

The Company shall endeavour to ensure that personal information is accurate, relevant, complete and processed only to the extent necessary for the purposes for which it was collected.

Privacy protection shall form an integral part of the Company's governance framework, risk management practices and customer service philosophy.



PURPOSE

3.1 Purpose of the Policy

The purpose of this Privacy Policy is to establish a comprehensive framework governing the collection, processing, storage, use, sharing, retention, disclosure and disposal of personal information by Home Plus Finance Private Limited ("HPFL" or the "Company") in the course of its business operations.

This Policy aims to ensure that all personal information collected by the Company is handled responsibly, securely and transparently while protecting the privacy rights of customers and other individuals whose information is processed by the Company.

The Company recognises that privacy and protection of personal information are essential to maintaining customer confidence and are fundamental components of good corporate governance, ethical business practices and regulatory compliance.

3.2 Objectives

The primary objectives of this Policy are to:

a. Regulatory Compliance

Ensure compliance with all applicable laws, regulations, regulatory directions, circulars and guidelines governing privacy, data protection, information security and digital lending issued by competent authorities from time to time.

b. Customer Trust

Promote customer confidence by ensuring that personal information is collected, processed and protected in a fair, transparent and responsible manner.

c. Responsible Data Processing

Establish principles for lawful, fair and transparent processing of personal information while limiting the collection and use of information to legitimate business purposes.

d. Protection of Personal Information

Implement appropriate administrative, technical and organisational safeguards to protect personal information against unauthorised access, misuse, disclosure, alteration, destruction or accidental loss.

e. Risk Management

Reduce operational, legal, regulatory and reputational risks associated with the collection, processing and storage of personal information.

f. Accountability



Clearly define the responsibilities of the Board of Directors, Management, Employees, Loan Service Providers (where applicable), Business Correspondents, Vendors and other authorised persons handling personal information.

g. Transparency

Ensure that customers are informed regarding:

- the categories of information collected;
- the purposes for which information is collected;
- the manner in which information is processed;
- the entities with whom information may be shared;
- customer rights in relation to their personal information; and
- the Company's grievance redressal mechanism.

h. Continuous Improvement

Establish a framework for periodic review and continual improvement of privacy practices to align with evolving legal, regulatory, technological and business requirements.

3.3 Policy Commitment

Home Plus Finance Private Limited is committed to maintaining the confidentiality, integrity and availability of personal information and shall process such information only for lawful and legitimate purposes consistent with applicable laws, contractual obligations and regulatory requirements.

The Company shall endeavour to maintain the highest standards of privacy protection across all business functions and customer interaction channels.

SCOPE AND APPLICABILITY

4.1 Scope

This Privacy Policy applies to all personal information collected, received, generated, processed, stored, transmitted, shared or otherwise handled by Home Plus Finance Private Limited in connection with its business operations.

The Policy covers information processed through both physical and digital channels, irrespective of the form in which such information is maintained.

The Policy applies throughout the lifecycle of personal information, including:

- Collection
- Recording



- Organisation
- Storage
- Retrieval
- Consultation
- Use
- Disclosure
- Sharing
- Transfer
- Archival
- Retention
- Disposal
- Destruction

4.2 Applicability

This Policy applies to:

Customers

Individuals applying for or availing any financial product or service offered by the Company.

Prospective Customers

Individuals making enquiries or expressing interest in the Company's products and services.

Co-applicants

Persons jointly applying for financial assistance with the primary borrower.

Guarantors

Individuals or entities providing guarantees in favour of the Company.

Property Owners

Owners of collateral or security offered for any financial facility.

Website Visitors

Persons accessing or using the Company's official website.

Mobile Application Users

Users of any mobile application or digital platform operated by or on behalf of the Company.



Loan Service Providers (LSPs)

Where permitted under applicable laws and contractual arrangements, entities providing services relating to customer acquisition, digital onboarding, documentation, collections or other support functions.

Business Correspondents

Business Correspondents, Direct Selling Agents, Channel Partners and other authorised representatives engaged by the Company.

Vendors and Service Providers

Third-party service providers processing personal information on behalf of the Company, including but not limited to:

- Technology service providers
- Cloud service providers
- Collection agencies
- Credit Information Companies
- Payment service providers
- Document storage vendors
- Legal professionals
- Auditors
- Consultants

Employees

Directors, employees, contractual staff, trainees, interns and any other persons authorised to process personal information on behalf of the Company.

4.3 Business Activities Covered

This Policy applies to personal information processed in connection with:

- Loan origination
- Customer onboarding
- Know Your Customer (KYC) verification
- Anti-Money Laundering (AML) compliance
- Credit appraisal
- Loan documentation



- Loan disbursement
- Loan servicing
- Collection and recovery activities
- Customer support services
- Grievance redressal
- Website operations
- Digital lending processes
- Co-lending arrangements
- Regulatory reporting
- Internal audit
- Statutory audit
- Risk management
- Fraud prevention
- Information security monitoring

4.4 Territorial Applicability

This Policy applies to all offices, branches, business locations, digital platforms and business operations of Home Plus Finance Private Limited within India and to any processing of personal information carried out on behalf of the Company, irrespective of the location from which such processing is performed, subject to applicable laws.

4.5 Exclusions

This Policy shall not apply to:

- Information that is lawfully available in the public domain.
 - Information processed solely for internal administrative purposes where no personal data is involved.
 - Information that is required to be disclosed under applicable law, judicial order or directions of a competent regulatory authority.
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4.6 Compliance

All employees, directors, consultants, vendors, Loan Service Providers, Business Correspondents and other authorised representatives handling personal information shall comply with this Policy and any related internal procedures, standards and guidelines issued by the Company from time to time.

Failure to comply with this Policy may result in disciplinary action, termination of contractual arrangements and such other action as may be considered appropriate under applicable laws and Company policies.

REGULATORY FRAMEWORK

5.1 Regulatory Background

Home Plus Finance Private Limited ("HPFL" or "the Company") shall ensure that all activities relating to the collection, processing, storage, sharing, retention and disposal of personal information are carried out in accordance with applicable laws, regulatory directions and industry best practices.

This Privacy Policy has been formulated to provide a comprehensive governance framework for protecting personal information while ensuring compliance with the legal and regulatory obligations applicable to the Company.

5.2 Applicable Laws and Regulations

This Policy shall be read in conjunction with the following laws, regulations, directions and guidelines, as amended from time to time:

A. Reserve Bank of India Act, 1934

The Company shall comply with all applicable provisions governing Non-Banking Financial Companies (NBFCs) and Housing Finance Companies, including directions issued by the Reserve Bank of India from time to time.

B. Companies Act, 2013

The Company shall maintain adequate governance, internal controls and accountability for protecting information assets and maintaining confidentiality.

C. Digital Personal Data Protection Act, 2023

The Company shall process personal data in accordance with the principles prescribed under the Digital Personal Data Protection Act, 2023, including lawful processing, consent management, protection of personal data and data principal rights, to the extent applicable.

D. Information Technology Act, 2000

The Company shall implement reasonable security practices and procedures for safeguarding electronic records and information systems.



E. Prevention of Money Laundering Act, 2002

Customer information collected for Know Your Customer (KYC), Customer Due Diligence (CDD), Anti-Money Laundering (AML) and Counter Financing of Terrorism (CFT) purposes shall be handled in accordance with applicable legal requirements.

5.3 RBI Regulatory Directions

Without limitation, this Policy shall operate in conjunction with:

- RBI Master Direction – Know Your Customer (KYC) Direction, 2016 (as amended from time to time);
 - RBI Master Direction – Non-Banking Financial Company – Scale Based Regulation Directions, 2023 (as amended from time to time);
 - RBI Fair Practices Code;
 - RBI Digital Lending Guidelines and related circulars, where applicable;
 - RBI Integrated Ombudsman Scheme, 2021;
 - RBI Outsourcing and Information Security related directions, where applicable;
 - Any circular, notification, guideline or direction issued by RBI relating to customer protection, digital lending, outsourcing, information security or privacy.
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5.4 Other Regulatory Requirements

Where applicable, the Company shall also comply with:

- Credit Information Companies (Regulation) Act, 2005;
 - Aadhaar related regulations applicable to regulated entities;
 - Income Tax Act, 1961;
 - Prevention of Fraud and Cyber Security requirements;
 - Directions issued by any statutory, judicial or regulatory authority having jurisdiction over the Company.
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5.5 Interpretation

In the event of any conflict between this Policy and any applicable law or regulatory direction, the provisions of such law or regulatory direction shall prevail to the extent of the inconsistency.



5.6 Responsibility

The Compliance Department shall monitor changes in applicable laws and regulations and recommend amendments to this Policy whenever required.

All departments shall ensure compliance with the regulatory framework applicable to their respective functions.

DEFINITIONS

For the purpose of this Policy, unless the context otherwise requires, the following terms shall have the meanings assigned below.

6.1 Board

"Board" means the Board of Directors of Home Plus Finance Private Limited.

6.2 Company

"Company" means Home Plus Finance Private Limited ("HPFL").

6.3 Personal Data / Personal Information

Any information relating to an identified or identifiable individual, whether collected in physical or electronic form, including but not limited to name, address, contact details, identification numbers, financial information, photographs, biometric information (where legally permitted), communication records and any other information capable of identifying such individual.

6.4 Data Principal

An individual to whom the personal data relates, as defined under the Digital Personal Data Protection Act, 2023.

6.5 Processing

Any operation performed on personal information including collection, recording, organisation, storage, adaptation, retrieval, consultation, use, disclosure, sharing, transmission, restriction, deletion or destruction.



6.6 Consent

A free, specific, informed and unambiguous indication of the individual's agreement for processing personal information for specified purposes.

6.7 Customer

Any person applying for, availing or intending to avail any product or service offered by the Company.

6.8 Co-applicant

A person jointly applying for a loan or financial assistance with the primary borrower.

6.9 Guarantor

A person providing a guarantee or security for repayment of any obligation owed to the Company.

6.10 Loan Service Provider (LSP)

Any person or entity engaged by the Company to perform one or more functions relating to customer acquisition, digital onboarding, KYC, servicing, collection, recovery, technology support or other lending-related services, in accordance with applicable RBI guidelines.

6.11 Business Correspondent

A representative authorised by the Company to provide specified financial services on its behalf in accordance with applicable regulations.

6.12 Co-lender

A regulated entity entering into a co-lending arrangement with the Company under applicable regulatory guidelines and contractual agreements.

6.13 Website

The official website of Home Plus Finance Private Limited and any associated digital platforms operated by or on behalf of the Company.



6.14 Mobile Application

Any mobile application, web application or digital lending platform operated by or on behalf of the Company.

6.15 Third Party

Any individual or organisation other than the Company, the customer or persons directly authorised by the customer.

6.16 Personal Data Breach

Any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information processed by the Company.

6.17 Sensitive Personal Information

Personal information requiring enhanced protection due to its confidential nature, including financial information, KYC documents, authentication credentials and any information designated as sensitive under applicable laws.

6.18 Policy

This Privacy Policy, including all amendments, schedules and annexures.

PRIVACY PRINCIPLES

7.1 General Principles

The Company shall adhere to the following principles while processing personal information.

7.2 Lawfulness

Personal information shall be collected and processed only for lawful purposes and in accordance with applicable legal and regulatory requirements.

7.3 Fairness

The Company shall process personal information fairly and without misleading or deceptive practices.



7.4 Transparency

Customers shall be informed regarding:

- the information collected;
- the purpose of collection;
- the manner of processing;
- entities with whom information may be shared;
- customer rights; and
- grievance redressal mechanisms.

7.5 Purpose Limitation

Personal information shall be collected only for specific, legitimate and lawful purposes and shall not be processed in a manner incompatible with those purposes unless otherwise permitted by law.

7.6 Data Minimisation

Only such personal information as is reasonably necessary for the intended purpose shall be collected and processed.

7.7 Accuracy

The Company shall take reasonable steps to ensure that personal information remains accurate, complete and up to date.

Customers shall promptly notify the Company of any changes in their personal information.

7.8 Storage Limitation

Personal information shall be retained only for as long as necessary to fulfil legal, regulatory, contractual and legitimate business requirements.

7.9 Confidentiality

Personal information shall be protected against unauthorised access, disclosure, misuse or loss through appropriate administrative, technical and physical safeguards.



7.10 Accountability

Every employee, director, contractor, consultant, Loan Service Provider, Business Correspondent and vendor handling personal information shall be accountable for complying with this Policy and maintaining confidentiality.

7.11 Security by Design

The Company shall endeavour to incorporate appropriate security controls into systems, applications and business processes involving personal information.

7.12 Need-to-Know Principle

Access to personal information shall be restricted to authorised persons requiring such access for legitimate business purposes.

7.13 Continuous Improvement

The Company shall periodically review its privacy practices, internal controls and security measures to ensure continued compliance with evolving legal, regulatory and business requirements.

7.14 Ethical Processing

The Company shall endeavour to process personal information responsibly, ethically and with due regard to the rights, dignity and expectations of customers and other individuals.

CATEGORIES OF PERSONAL INFORMATION

8.1 General

Home Plus Finance Private Limited ("HPFL" or "the Company") may collect, receive, generate, store and process various categories of personal information depending upon the nature of the relationship with the customer, the products and services availed, legal obligations and regulatory requirements.

The Company shall collect only such information as is necessary for legitimate business purposes and in accordance with applicable laws.

8.2 Identity Information

The Company may collect identity-related information including but not limited to:



- Full Name
- Father's / Mother's / Spouse's Name
- Date of Birth
- Gender
- Nationality
- Photograph
- Signature
- Permanent Account Number (PAN)
- Aadhaar Number (where permitted by law)
- Passport
- Driving Licence
- Voter Identity Card
- Any other officially valid document prescribed by law.

8.3 Contact Information

The Company may collect:

- Residential Address
- Office Address
- Permanent Address
- Mobile Number(s)
- Telephone Number(s)
- Email Address
- Emergency Contact Details
- Communication Preferences

8.4 Financial Information

The Company may collect:

- Income Details
- Salary Information



- Bank Account Details
- Bank Statements
- Income Tax Returns
- GST Information
- Business Financial Statements
- Existing Loan Details
- Credit Bureau Reports
- Repayment History
- Asset and Liability Information

8.5 Employment and Business Information

Where applicable:

- Employer Name
- Employee ID
- Designation
- Length of Service
- Business Registration Details
- Nature of Business
- Turnover
- Professional Qualifications
- Business Address

8.6 Property Information

For secured lending products, the Company may collect:

- Property Ownership Details
- Title Documents
- Legal Opinion
- Valuation Reports
- Encumbrance Details



- Property Tax Receipts
 - Building Approval Documents
 - Property Photographs
 - Geo-location Details (where applicable)
-

8.7 Digital Information

When customers use the Company's website, mobile applications or digital lending platforms, the Company may collect:

- IP Address
 - Browser Information
 - Device Information
 - Device ID
 - Operating System
 - Login Information
 - Application Logs
 - Website Usage Information
 - Cookies
 - Session Information
 - Location Information (where consented)
-

8.8 Communication Records

The Company may maintain records relating to:

- Emails
- Customer Service Calls
- SMS Communications
- WhatsApp Communications
- Complaint Records
- Feedback
- Correspondence
- Video KYC interactions (where applicable)



8.9 Regulatory Information

Information collected to comply with legal and regulatory obligations including:

- KYC Documents
- AML Screening Results
- Sanctions Screening
- Politically Exposed Person (PEP) Status
- FATCA / CRS Declarations (where applicable)

8.10 Information from Third Parties

The Company may receive information from:

- Credit Information Companies
- Co-Lenders
- Loan Service Providers
- Business Correspondents
- Banks
- Government Authorities
- Regulators
- Public Databases
- Other authorised sources permitted by law.

8.11 Data Minimisation

The Company shall endeavour to collect only such information as is necessary for lawful business purposes and regulatory compliance.



SOURCES OF PERSONAL INFORMATION

9.1 Direct Collection

Personal information may be collected directly from customers through:

- Loan Application Forms
- KYC Documents
- Website
- Mobile Applications
- Customer Service Centres
- Branch Offices
- Email Communications
- Customer Meetings
- Digital Lending Platforms
- Video KYC
- Telephonic Interactions

9.2 Indirect Collection

Subject to applicable laws, the Company may obtain information from:

- Credit Information Companies
- Co-Lenders
- Loan Service Providers
- Business Correspondents
- Banks
- Government Authorities
- Property Valuers
- Legal Professionals
- Employers
- Existing Customers (Referral Programmes)
- Public Records



- Publicly Available Sources
-

9.3 Automated Collection

Certain technical information may be collected automatically through:

- Cookies
 - Server Logs
 - Website Analytics
 - Device Information
 - Security Monitoring Systems
 - Application Logs
-

9.4 Accuracy of Information

Customers are responsible for ensuring that the information provided to the Company is accurate, complete and updated.

The Company reserves the right to seek documentary evidence for verification whenever considered necessary.

9.5 Verification

The Company may verify customer information through authorised agencies, regulators or public records to comply with legal and regulatory obligations.

PURPOSE OF COLLECTION AND PROCESSING OF PERSONAL INFORMATION

10.1 General

The Company shall collect and process personal information only for lawful, legitimate and specified purposes connected with its business operations.

10.2 Customer Onboarding

Personal information may be collected for:

- Customer Identification
- Customer Due Diligence
- KYC Verification
- AML Compliance



- Risk Assessment
- Fraud Prevention

10.3 Credit Assessment

The Company may process information for:

- Loan Eligibility Assessment
- Credit Scoring
- Income Verification
- Property Assessment
- Repayment Capacity Evaluation
- Internal Credit Approval

10.4 Loan Administration

Information may be processed for:

- Loan Documentation
- Loan Disbursement
- Account Maintenance
- EMI Management
- Collection Activities
- Recovery Proceedings
- Closure of Loan Accounts

10.5 Regulatory Compliance

The Company may process information for:

- RBI Compliance
- KYC Compliance
- AML Monitoring
- Reporting to Credit Information Companies
- Audit Requirements



- Regulatory Reporting
 - Court Orders
 - Law Enforcement Requests
-

10.6 Customer Service

Information may be processed to:

- Resolve Complaints
 - Respond to Customer Queries
 - Improve Service Delivery
 - Conduct Customer Satisfaction Surveys
 - Maintain Communication Records
-

10.7 Internal Business Operations

The Company may use information for:

- Risk Management
 - Internal Audit
 - Information Security
 - Fraud Detection
 - Litigation Management
 - Business Continuity Planning
 - Analytics and Reporting
 - Policy Formulation
-

10.8 Marketing

Where permitted by law and subject to customer preferences, the Company may communicate information regarding products and services.

Customers may opt out of marketing communications wherever applicable.

10.9 Research and Analytics



The Company may use anonymised or aggregated information for business intelligence, statistical analysis and service improvement, provided such use does not identify individual customers.

CUSTOMER CONSENT

11.1 General Principle

The Company shall obtain customer consent wherever required under applicable laws and regulations before collecting, using or sharing personal information.

11.2 Nature of Consent

Consent obtained by the Company shall, wherever applicable, be:

- Free
 - Specific
 - Informed
 - Unambiguous
 - Capable of being withdrawn in accordance with applicable laws
-

11.3 Modes of Consent

Consent may be obtained through:

- Physical Application Forms
 - Digital Applications
 - Website
 - Mobile Applications
 - Electronic Acceptance
 - OTP Authentication
 - Electronic Signature
 - Video Confirmation
 - Email Confirmation
 - Other legally recognised electronic methods
-

11.4 Consent for Digital Lending



Where loans are originated or serviced through digital channels or Loan Service Providers (LSPs), the Company shall ensure that:

- customer consent is obtained before collecting personal information;
- customers are informed of the purpose of collection;
- consent records are maintained;
- information shared with authorised third parties is disclosed appropriately;
- customers receive applicable disclosures before accepting a loan offer.

11.5 Withdrawal of Consent

Customers may withdraw consent for future processing wherever permitted by law.

Withdrawal of consent shall not affect:

- processing already carried out;
- processing required under applicable law;
- information required for regulatory compliance;
- information necessary for enforcement of contractual obligations.

11.6 Refusal to Provide Information

Where a customer declines to provide information required by law or necessary for providing financial services, the Company may be unable to process the application or continue providing certain services.

11.7 Record of Consent

The Company shall maintain appropriate records evidencing customer consent wherever required by law or internal policy.

Such records may be maintained electronically or physically and shall be retained in accordance with the Company's Record Retention Policy.

11.8 Modification of Consent

Customers may update their communication preferences or modify consent requests by contacting the Company through the prescribed customer service channels, subject to applicable legal and regulatory requirements.



12.1 Objective

This Chapter establishes the privacy and data protection principles applicable to personal information processed through digital lending channels, Loan Service Providers (LSPs), co-lending arrangements and other technology-enabled lending models adopted by Home Plus Finance Private Limited ("HPFL" or "the Company").

The Company shall ensure that customer privacy is protected throughout the digital lending lifecycle in accordance with applicable laws and regulatory directions.

12.2 Digital Lending

Where loans are sourced, originated, processed or serviced through digital platforms, the Company shall ensure that:

- customers receive complete and accurate disclosures before accepting any loan offer;
- personal information is collected only for lawful and legitimate purposes;
- customer consent is obtained wherever required;
- digital records are securely maintained;
- customer information is processed only by authorised persons.

12.3 Loan Service Providers (LSPs)

Where the Company appoints one or more Loan Service Providers, such entities shall:

- process personal information only on behalf of the Company;
- maintain confidentiality of customer information;
- comply with contractual privacy obligations;
- implement adequate information security controls;
- permit audits by the Company where contractually required;
- comply with applicable RBI directions and other regulatory requirements.

Appointment of an LSP shall not dilute the Company's responsibility towards protection of customer information.

12.4 Customer Consent

Before collecting personal information through any digital channel, the Company or its authorised LSP shall:

- inform customers regarding the purpose of collection;



- obtain appropriate consent where required;
 - provide applicable privacy disclosures;
 - record customer acceptance using legally recognised methods.
-

12.5 Data Sharing through Digital Channels

Customer information shall be shared with authorised entities only to the extent necessary for:

- loan origination;
 - credit appraisal;
 - KYC verification;
 - fraud prevention;
 - regulatory reporting;
 - loan servicing;
 - collection activities;
 - customer support.
-

12.6 Digital Records

The Company shall maintain appropriate audit trails relating to:

- customer consent;
 - loan applications;
 - document uploads;
 - communications;
 - digital agreements;
 - electronic signatures;
 - system-generated logs.
-

12.7 Co-Lending Arrangements

Where loans are originated under co-lending arrangements, personal information may be shared between participating regulated entities only to the extent necessary for:

- credit assessment;
- documentation;



- servicing;
- collection;
- regulatory reporting;
- customer support;
- contractual obligations.

Such sharing shall be governed by applicable laws and contractual arrangements.

12.8 Customer Communication

Customers shall be informed regarding:

- identity of the regulated entity;
- identity of authorised LSPs (where applicable);
- purpose of data collection;
- grievance mechanism;
- privacy practices.

12.9 Monitoring

The Company shall periodically review digital lending processes and LSP arrangements to ensure compliance with this Policy, applicable laws and contractual obligations.

SHARING AND DISCLOSURE OF PERSONAL INFORMATION

13.1 General Principle

The Company shall not sell customer personal information.

Personal information shall be disclosed only where:

- authorised by the customer;
- required by law;
- required under contractual arrangements;
- necessary for legitimate business purposes;
- required by regulators or competent authorities.

13.2 Internal Sharing



Information may be shared internally among authorised departments including:

- Credit
- Operations
- Finance
- Compliance
- Risk Management
- Internal Audit
- Information Technology
- Customer Service

Access shall be provided strictly on a need-to-know basis.

13.3 Sharing with Third Parties

Subject to applicable laws, information may be shared with:

- Credit Information Companies;
- Banks;
- Financial Institutions;
- Co-Lenders;
- Loan Service Providers;
- Collection Agencies;
- Business Correspondents;
- Payment Service Providers;
- Technology Service Providers;
- Cloud Service Providers;
- Legal Advisors;
- Auditors;
- Insurers;
- Valuers;
- Advocates;
- Government Authorities;



- Regulators.
-

13.4 Regulatory Disclosure

The Company may disclose information where required under:

- RBI directions;
 - Court Orders;
 - Income Tax Authorities;
 - Law Enforcement Agencies;
 - Financial Intelligence Unit (FIU-IND);
 - Any competent statutory authority.
-

13.5 Confidentiality

All third parties receiving customer information shall be required to maintain confidentiality and implement appropriate security controls in accordance with contractual obligations.

13.6 Cross-border Transfer

Where permitted by applicable law and business requirements, information may be transferred outside India subject to adequate safeguards and legal requirements.

13.7 Disclosure Restrictions

The Company shall not disclose customer information to unauthorised persons except where disclosure is required by law or expressly authorised by the customer.

WEBSITE PRIVACY, COOKIES AND ANALYTICS

14.1 Website Privacy

Visitors to the Company's website may voluntarily provide personal information while:

- submitting enquiries;
- applying for products;
- registering complaints;
- downloading documents;



- subscribing to updates.
-

14.2 Cookies

The Company's website may use cookies to:

- improve website functionality;
- remember user preferences;
- maintain user sessions;
- enhance website security;
- analyse website usage.

Customers may manage cookie preferences through their browser settings, though disabling certain cookies may affect website functionality.

14.3 Analytics

The Company may use analytical tools to understand:

- visitor traffic;
- website performance;
- customer behaviour;
- system usage;
- service improvement opportunities.

Where possible, analytics shall use aggregated or anonymised information.

14.4 External Links

The Company's website may contain links to third-party websites.

The Company shall not be responsible for the privacy practices or content of such external websites.

Users are encouraged to review the privacy policies of third-party websites before providing personal information.

14.5 Online Security

Reasonable security measures shall be implemented to protect online transactions and customer information.



Customers are advised:

- not to share passwords or OTPs;
- not to disclose confidential credentials to unauthorised persons;
- to immediately report suspected fraud or unauthorised activity.

DATA SECURITY AND INFORMATION PROTECTION

15.1 Commitment

The Company is committed to protecting personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.

15.2 Security Controls

The Company shall implement appropriate safeguards including:

- access controls;
- authentication mechanisms;
- password controls;
- encryption (where appropriate);
- secure communication channels;
- anti-malware protection;
- firewalls;
- endpoint protection;
- regular system updates;
- secure backups.

15.3 Physical Security

Physical records containing personal information shall be protected through:

- controlled access;
- secure storage;
- visitor controls;
- surveillance (where applicable);
- document disposal procedures.



15.4 Logical Security

Access to electronic information shall be granted only to authorised personnel based on business requirements.

User access shall be periodically reviewed.

15.5 Vendor Security

Service providers processing customer information shall maintain security measures appropriate to the nature of the services provided and contractual obligations.

15.6 Employee Responsibilities

Employees shall:

- maintain confidentiality;
- protect customer information;
- immediately report security incidents;
- comply with Company policies;
- complete mandatory privacy and information security awareness programmes.

15.7 Security Monitoring

The Company may periodically assess:

- information security controls;
- cyber security risks;
- system vulnerabilities;
- access controls;
- compliance with this Policy.

Appropriate corrective actions shall be implemented wherever necessary.

15.8 Continuous Improvement

The Company shall endeavour to continuously strengthen its information security framework having regard to technological developments, emerging cyber threats, business requirements and applicable regulatory expectations.



DATA RETENTION AND RECORD MANAGEMENT

16.1 Objective

Home Plus Finance Private Limited ("HPFL" or "the Company") shall retain personal information only for as long as necessary to fulfil the purpose for which it was collected, comply with applicable legal and regulatory requirements, meet contractual obligations and protect the legitimate interests of the Company.

The Company shall establish appropriate procedures for the retention, archival and secure disposal of records containing personal information.

16.2 Retention Principles

Personal information shall be retained based on the following principles:

- Legal and regulatory requirements.
- Contractual obligations.
- Operational necessity.
- Litigation and dispute management.
- Audit requirements.
- Business continuity requirements.
- Customer service requirements.

The Company shall avoid retaining personal information for longer than necessary unless required under applicable law.

16.3 Categories of Records

Records maintained by the Company may include:

- Customer Application Forms
- KYC Documents
- Loan Agreements
- Sanction Letters
- Property Documents
- Valuation Reports
- Legal Opinions



- Bank Statements
- Credit Bureau Reports
- Repayment Records
- Collection Records
- Complaint Records
- Audit Reports
- Electronic Records
- Email Communications
- Digital Lending Records
- Consent Records
- Call Recordings (where applicable)

16.4 Storage of Records

The Company may maintain records:

- in physical form;
- in electronic form;
- on secured servers;
- through approved cloud infrastructure;
- through authorised document management systems.

Appropriate access controls shall be implemented for all storage locations.

16.5 Disposal of Records

Upon expiry of the applicable retention period, records shall be securely disposed of using methods appropriate to the nature of the information, including:

- secure shredding of paper records;
- secure deletion of electronic records;
- destruction of storage media where required.

Disposal shall be carried out in accordance with the Company's Record Retention Policy and Information Security Policy.



16.6 Suspension of Disposal

The Company may suspend disposal of records where such records are required for:

- ongoing litigation;
- investigations;
- regulatory inspections;
- audit proceedings;
- legal notices;
- enforcement actions.

16.7 Record Integrity

The Company shall endeavour to maintain the accuracy, completeness and integrity of records throughout their retention period.

CUSTOMER RIGHTS

17.1 General

The Company recognises the privacy rights of customers and shall endeavour to facilitate the exercise of such rights in accordance with applicable laws and regulatory requirements.

17.2 Right to Information

Customers may seek information regarding:

- categories of personal information collected;
- purpose of processing;
- categories of recipients with whom information may be shared;
- grievance redressal mechanism;
- contact details for privacy-related queries.

17.3 Right to Correction

Customers may request correction or updating of inaccurate or incomplete personal information by submitting appropriate documentary evidence.



The Company may verify such requests before making any changes.

17.4 Right to Access

Subject to applicable laws and regulatory restrictions, customers may request access to their personal information maintained by the Company.

The Company may refuse access where disclosure is prohibited by law or may adversely affect legal proceedings, regulatory obligations or the rights of third parties.

17.5 Right to Withdraw Consent

Where processing is based on customer consent, customers may withdraw such consent for future processing, subject to:

- legal obligations;
- contractual obligations;
- regulatory requirements.

Withdrawal of consent shall not invalidate processing already undertaken lawfully.

17.6 Right to Raise Complaints

Customers may submit complaints relating to privacy, data security or information handling through the Company's Grievance Redressal Mechanism.

17.7 Verification of Identity

Before acting upon any request relating to personal information, the Company may require reasonable proof of identity to protect customer privacy and prevent unauthorised disclosure.

17.8 Limitations

The rights described in this Chapter shall be exercised subject to applicable laws, RBI directions, contractual obligations and judicial or regulatory orders.



DATA BREACH AND INCIDENT MANAGEMENT

18.1 Objective

The Company shall establish appropriate procedures for identifying, reporting, investigating and responding to incidents involving personal information.

18.2 Security Incident

A security incident may include:

- unauthorised access;
 - unauthorised disclosure;
 - accidental disclosure;
 - loss of confidential information;
 - cyber attack;
 - malware infection;
 - ransomware attack;
 - theft of records;
 - compromise of credentials;
 - system intrusion.
-

18.3 Reporting

Employees shall immediately report any actual or suspected privacy or information security incident to the designated authority in accordance with the Company's Information Security Policy.

18.4 Investigation

Upon becoming aware of an incident, the Company shall:

- assess the nature of the incident;
- determine the information affected;
- identify impacted systems;
- evaluate potential risks;
- preserve relevant evidence;
- initiate corrective actions.



18.5 Containment

Reasonable steps shall be taken to minimise the impact of the incident, including:

- isolating affected systems;
- restricting unauthorised access;
- restoring services;
- implementing temporary controls.

18.6 Regulatory Reporting

Where required under applicable laws or regulatory directions, the Company shall report security incidents to the appropriate authorities within the prescribed timelines.

18.7 Corrective Action

Following investigation, the Company shall implement corrective and preventive measures to reduce the likelihood of recurrence.

18.8 Awareness

The Company shall periodically conduct employee awareness programmes on privacy protection, cyber security and incident reporting.

ROLES AND RESPONSIBILITIES

19.1 Board of Directors

The Board shall:

- approve this Privacy Policy;
- provide oversight over privacy governance;
- review significant privacy risks;
- ensure availability of adequate resources.

19.2 Managing Director

The Managing Director shall:



- ensure implementation of this Policy;
 - promote a culture of privacy and information security;
 - ensure compliance with applicable laws and regulations.
-

19.3 Compliance Department

The Compliance Department shall:

- monitor regulatory developments;
 - recommend amendments to this Policy;
 - oversee compliance with privacy obligations;
 - coordinate regulatory inspections relating to privacy.
-

19.4 Information Technology Department

The IT Department shall:

- implement technical security controls;
 - manage user access controls;
 - maintain system security;
 - support incident response;
 - ensure secure backup and recovery processes.
-

19.5 Business and Operations Departments

Business units shall:

- collect only authorised information;
 - ensure accuracy of customer information;
 - comply with this Policy during business operations;
 - protect confidential information.
-

19.6 Employees

Every employee shall:

- maintain confidentiality;



- access information strictly on a need-to-know basis;
 - protect Company information assets;
 - comply with applicable policies;
 - report suspected security incidents immediately.
-

19.7 Loan Service Providers and Vendors

All Loan Service Providers, Business Correspondents, outsourced service providers and vendors handling personal information on behalf of the Company shall:

- comply with contractual confidentiality obligations;
 - implement reasonable security measures;
 - process information only for authorised purposes;
 - cooperate during audits and investigations where applicable.
-

19.8 Internal Audit

Internal Audit shall periodically review compliance with this Policy and report significant observations to the appropriate management and governance forums.

19.9 Responsibility of Every Individual

Protection of personal information is the responsibility of every director, employee, contractor, consultant and authorised representative of the Company.

All persons handling personal information shall exercise due care, maintain confidentiality and comply with the principles laid down in this Policy.

GRIEVANCE REDRESSAL MECHANISM

20.1 Objective

Home Plus Finance Private Limited ("HPFL" or "the Company") is committed to maintaining a fair, transparent and efficient mechanism for addressing complaints relating to privacy, confidentiality, collection, processing, storage, sharing and protection of personal information.

The Company shall endeavour to resolve all grievances promptly, fairly and in accordance with applicable laws and regulatory requirements.

20.2 Scope



This Chapter applies to complaints relating to:

- Collection of personal information;
- Use or processing of personal information;
- Disclosure or sharing of personal information;
- Inaccurate or incomplete customer information;
- Unauthorised access to customer information;
- Data security or privacy concerns;
- Digital lending privacy issues;
- Loan Service Provider (LSP) privacy-related concerns;
- Website privacy issues;
- Cookie-related concerns;
- Customer consent;
- Withdrawal of consent;
- Any other matter relating to the Company's handling of personal information.

20.3 Grievance Registration

Customers may register complaints through any of the following channels:

- Branch Offices
- Customer Care Centre
- Official Email Address
- Company's Website
- Mobile Application (where applicable)
- Written Representation
- Online Complaint Portal (where available)

The Company may introduce additional complaint channels from time to time to improve customer accessibility.

20.4 Information Required

Customers are encouraged to provide the following details while lodging a complaint:

- Name of the Customer;



- Loan Account Number (if applicable);
- Registered Mobile Number;
- Email Address;
- Description of the Complaint;
- Relevant Supporting Documents;
- Preferred Mode of Communication.

The Company may seek additional information wherever required for proper investigation.

20.5 Acknowledgement

The Company shall endeavour to acknowledge complaints received through electronic channels within a reasonable period.

Each complaint shall be assigned a unique reference number for future correspondence and tracking.

20.6 Investigation

Every complaint shall be investigated by the appropriate department depending upon the nature of the grievance.

Where required, the Company may:

- verify customer records;
- obtain additional documents;
- consult internal departments;
- seek clarification from authorised service providers;
- conduct system-level verification.

20.7 Resolution Timeline

The Company shall endeavour to resolve customer complaints as expeditiously as possible and, in any event, within the timelines prescribed under applicable laws or regulatory directions.

Customers shall be informed regarding the outcome of the investigation through an appropriate communication channel.



20.8 Escalation Matrix

Where a customer is not satisfied with the resolution provided at the initial level, the complaint may be escalated in accordance with the Company's approved Grievance Redressal Policy.

The Company's escalation mechanism shall include:

Level Customer Care / Branch	1
↓	
Level Grievance Redressal Officer	2
↓	
Level Principal Nodal Officer	3

Customers shall be informed of the contact details of the relevant officers through the Company's website and other communication channels.

20.9 RBI Integrated Ombudsman Scheme

If the Company does not resolve a complaint within the period prescribed under the applicable RBI directions, or if the customer remains dissatisfied with the Company's final response, the customer may, where eligible, lodge a complaint under the **Reserve Bank – Integrated Ombudsman Scheme, 2021**, through the **RBI Complaint Management System (CMS)** or such other mechanism as may be prescribed by the Reserve Bank of India from time to time.

The Company shall prominently display the details of the grievance escalation mechanism, including the RBI CMS portal, on its website.

20.10 Confidentiality

All complaints relating to privacy shall be handled confidentially.

Information relating to complaints shall be disclosed only to persons who require such information for investigation, resolution or regulatory compliance.

20.11 Complaint Records

The Company shall maintain appropriate records relating to:

- complaints received;



- acknowledgements;
- investigation findings;
- actions taken;
- communication with customers;
- closure reports.

Complaint records shall be retained in accordance with the Company's Record Retention Policy.

20.12 Monitoring and Reporting

The Compliance Department shall periodically review privacy-related complaints to identify:

- recurring issues;
- process deficiencies;
- system improvements;
- employee training requirements;
- policy enhancements.

Significant trends may be reported to Senior Management and the Board of Directors as considered appropriate.

POLICY REVIEW, EXCEPTIONS AND AMENDMENTS

21.1 Periodic Review

This Privacy Policy shall be reviewed at least once every year or earlier whenever considered necessary due to:

- changes in applicable laws;
- amendments to RBI directions;
- changes in business operations;
- introduction of new products;
- implementation of new technology;
- cyber security developments;
- audit observations;
- regulatory inspections;



- Board directions.
-

21.2 Policy Amendments

The Company reserves the right to modify, revise or replace this Policy at any time to ensure continued compliance with applicable laws, regulatory requirements and business needs.

Any amendment shall become effective from the date approved by the Board of Directors or such authority as may be authorised by the Board.

21.3 Regulatory Changes

Where any provision of this Policy becomes inconsistent with applicable laws or regulatory directions, such law or regulatory direction shall prevail to the extent of the inconsistency.

Necessary amendments to this Policy shall be placed before the Board of Directors for approval at the earliest appropriate opportunity.

21.4 Exceptions

Any exception to this Policy shall:

- be supported by documented reasons;
- comply with applicable legal requirements;
- receive approval from the competent authority in accordance with the Company's Delegation of Authority.

No exception shall be permitted where prohibited by law or regulatory direction.

21.5 Interpretation

Any question regarding interpretation of this Policy shall be referred to the Compliance Department.

In case of ambiguity, the interpretation consistent with applicable laws and regulatory requirements shall prevail.

21.6 Related Policies

This Policy shall be read together with the following Company policies, as amended from time to time:

- Fair Practices Code
- KYC & AML Policy



- Information Security Policy
 - Digital Lending Policy
 - Co-Lending Policy
 - Interest Rate Policy
 - Grievance Redressal Policy
 - Record Retention Policy
 - Code of Conduct
 - Vendor Management Policy
 - Business Continuity Policy
-

BOARD APPROVAL AND EFFECTIVE DATE

22.1 Board Approval

This Privacy Policy has been approved by the **Board of Directors of Home Plus Finance Private Limited** and shall come into effect from the date approved by the Board.

22.2 Authority

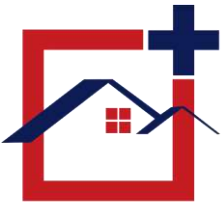
The Board of Directors authorises the Managing Director and the Compliance Department to take all necessary steps for the effective implementation, communication and administration of this Policy.

22.3 Policy Ownership

The Compliance Department shall be the owner and custodian of this Privacy Policy.

The Compliance Department shall ensure that:

- the latest approved version is maintained;
 - obsolete versions are withdrawn from circulation;
 - amendments are appropriately documented;
 - employees are informed of material changes.
-



22.4 Communication

The latest approved version of this Policy shall be:

- made available to relevant employees;
- published on the Company's official website, where applicable;
- shared with regulators, auditors and business partners when required;
- referred to during employee induction and periodic training programmes.

22.5 Compliance Declaration

All employees, directors, consultants, Loan Service Providers, Business Correspondents, outsourced service providers and other authorised representatives handling personal information shall comply with the provisions of this Privacy Policy.

Failure to comply with this Policy may result in disciplinary action, contractual remedies or any other action considered appropriate by the Company, in addition to any action required under applicable laws.

22.6 Certification

This Policy supersedes all previous Privacy Policies, guidelines or instructions relating to the protection and processing of personal information issued by the Company to the extent they are inconsistent with this Policy.

This Policy shall remain in force until amended, replaced or withdrawn by the Board of Directors.

Approved By:

Board of Directors

Home Plus Finance Private Limited

Approval Date: 24th June 2024

Effective Date: 24th June 2024

Next Review Date: As Required.