

**DOCUMENT INFORMATION**

<b>Company</b>	<b>Documents Type</b>	<b>Approval date</b>	<b>Approved by</b>
Samunnati Financial Intermediation and Services Private Limited	Privacy and Disclosure Policy	23 <sup>rd</sup> April 2018	Board of Directors

**Privacy & Disclosure Policy**

Samunnati Financial Intermediation & Services Private Limited (SFISPL) recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with SFISPL. Keeping personal information of customers secure and using it solely for activities related to SFISPL and preventing any misuse thereof is a top priority of SFISPL. SFISPL has adopted the privacy policy aimed at protecting the personal information entrusted and disclosed by the customers [**“the Policy”**]. This policy governs the way in which SFISPL collects, uses, discloses, stores, secures and disposes of personal information and sensitive personal data or information.

**Definitions**

“Personal information” means any information that relates to a natural person, which is capable of identifying such person, either directly or indirectly, either independently or in combination with other information, either available or likely to be available with SFISPL.

“Sensitive personal data or information” of a person or business legal entity means such personal /Business information which consists of information relating to any or all of the following:

- password;
- financial information such as details pertaining to a Bank account or credit card or debit card or any other payment instrument;
- physical, physiological and mental health condition;
- sexual orientation;
- medical records & history;
- biometric information;
- any detail relating to the above clauses as provided to SFISPL for providing service, or received by SFISPL for processing, stored or processed under lawful contract or otherwise.

Provided that the following shall not be regarded as sensitive personal data or information for the purposes of this policy:

- any information that is freely available or accessible in public domain or furnished under the right to information act, 2005 or any other law for the time being in force
- information obtained from a business legal entity in addition to "personal information"
- KYC and other information provided by the customer at the time of commencing a relationship or any time thereafter
- information about transactions with SFISPL
- has been obtained by SFISPL from a third person without any obligations of confidentiality.
- Furnished pursuant to any directions of a governmental authority or court of law.
- was rightfully in the SFISPL’s possession prior to receipt from the Customer free of any obligation of confidence,

**Applicability**

This Policy is applicable to personal information and sensitive personal data, or information collected by SFISPL or its affiliates directly from the customer or through SFISPL’s online portals, mobile apps and electronic communications as also any information collected by SFISPL’s server from the customer’s browser.

**Purpose of Collection and Use of Personal Information**

SFISPL collects and uses the financial information and other personal information from its customers. This information is collected and used for specific business purposes or for other related purposes designated by SFISPL or for a lawful purpose to comply with the applicable laws and regulations. SFISPL shall not divulge any personal information collected from the customer, for cross selling or any other purpose.

The authenticity of the personal information provided by the customer shall not be the responsibility of SFISPL.

## SAMUNNATI FINANCIAL INTERMEDIATION AND SERVICES PRIVATE LIMITED

### Disclosure of Personal Information

The personal information collected by SFISPL shall not be disclosed to any other organization except:

1. where the disclosure has been agreed upon in a written contract or otherwise between SFISPL and the customer;
2. where SFISPL is required to disclose the personal information to a third party on a need-to-know basis, provided that in such case SFISPL shall inform such third party of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of SFISPL.
3. Furnished pursuant to any directions of a governmental authority or court of law.

### Reasonable Security Practices and Procedures

The security of personal information is priority and will be protected by maintaining physical, electronic, and procedural safeguards that meet applicable laws. SFISPL shall take reasonable steps and measures to protect the security of the customer's personal information from misuse and loss, un-authorized access, modification or disclosure. SFISPL will maintain its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. SFISPL will ensure that its employees and affiliates respect the confidentiality of any personal information held by SFISPL.

### Exclusions

Notwithstanding anything mentioned in the Policy, the Policy shall exclude information that is needed to be shared with others due to extant regulations e.g. credit bureaus, CKYC registry, ROC and RBI and also where SFISPL is legally bound to disclose information including but not limited to FIU, Enforcement Directorate, IT department or as required by a Court of Law.

### Contact Information

In order to address any discrepancies or grievances related to the personal information residing with SFISPL, the customer may visit: [customervoice@samfin.in](mailto:customervoice@samfin.in)

### Notice of change

SFISPL may, from time to time, change this Policy. The effective date of this Policy, as stated below, indicates the last time this Policy was revised or materially changed.

### Cookie policy

SFISPL digital platforms use various third party analytical tools. These tools use cookies which are downloaded to your device when you visit a website in order to provide a personalized browsing experience. Cookies are used for lots of tasks like remembering your preferences & settings, provide personalized browsing experience and analyze site operations. These cookies collect information about how users use a website, for instance, how often visited pages. All information collected by third party cookies is aggregated and anonymous. By using our website user/s agree that these types of cookies can be placed on his/her device. User/s is free to disable/delete these cookies by changing his/her device / browser settings. SFISPL is not responsible for cookies placed in the device of user/s by any other website and information collected thereto.

### Effective Date

The policy would come into effect from 23<sup>rd</sup> April 2018.