

Privacy Policy

Approvals

Date	Approving Authority
October 27, 2023	Board of Directors
May 09, 2023	Board of Directors
July 30, 2022	Board of Directors
November 02, 2021	Board of Directors
June 10, 2020	Board of Directors

Version Control

Version	Date	Change History
2.1	October 27, 2023	No Change
1.3	May 09, 2023	Changes are pertaining to UIDAI checklist/recommendations which have been absorbed in IT policy for Aadhar based Authentication process.
1.2	July 30, 2022	No Change
1.1	November 02, 2021	No Change
1	June 10, 2020	No Change

Policy Owner: IT Department

Disclaimer

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PRIVACY POLICY

This Privacy Policy (“**Policy**”) explains our policy regarding the collection, use, disclosure and transfer of your information by India Shelter Finance Corporation Limited and/or its subsidiary (ies) and / or its associates and/or its affiliate(s) (collectively referred to as the “**Company**”), which operates the website (“**Website**”) and mobile applications and other allied services (“**India Shelter App**” or “**App**”). This Policy forms part and parcel of the ‘Terms of Use’ as relevant for App and Website services (“**App and Website Services**”).

The Company respects privacy of the users of App and Website Services and is committed to reasonably protect it in all respects. The information about the user as collected by the Company is:

- (a) Information supplied by users on the App and / or Website, as the case may be; and
- (b) Information automatically tracked while using a mobile device having App and Website Services.

Mandatory Registration for App:

It is mandatory to register yourself in order to use the App where possible. We indicate which fields are mandatory and which are optional. You would be given an option to accept or decline the terms of this Policy. We will not be able to register you, if you are not in agreement with the terms of this Policy.

It is clarified that the registration is not mandatory for using the Website. If you access and use the Website, you would be deemed to give your consent for collection, storage

and use of Personal Information in terms of the provisions of this Policy.

As we update, improve and expand our services pertaining to App and Website Services, this Policy may change, so please check the same periodically. By accessing and/or using our App and Website Services, you consent to collection, storage, and use of your Personal Information (*as defined below*) including any changes thereto as provided by you, from time to time) for any of the services that we offer.

Collection and use of Personal Information (applicable only for App)

When you register for our app and / or use our App, we collect and store your personal information such as, but not limited to, your name, demographics, behavior patterns, financial details and/or such other information as may be provided by you from time to time such as billing address, details of recipients, his or her location, etc. on the website and / or App ("**Personal Information**"), which is provided by you from time to time. Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience of the services rendered or to be rendered by us. This also allows us to provide our services and features that most likely meet your needs, and to customize our App and / or Website to make your experience safer and easier. More importantly, while doing so we collect Personal Information from you that we consider necessary for achieving this purpose.

We use Personal Information to provide the services you request. We use your Personal Information to resolve disputes; troubleshoot problems; promote our services; collect money; measure consumer interest in our products and services, inform you about online and offline offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our terms and conditions; and as otherwise described to you at the time of collection.

We identify and use your IP address to help diagnose problems with our server, and to administer our App. Your IP address is also used to help identify you and to gather broad demographic information.

We may automatically track certain information about you based upon your behaviour on our App and Website. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users. This information is compiled and may be analysed on an individual basis.

We use data collection devices such as 'Cookies' etc. on certain pages of the App and Website to help analyse page flow, measure promotional effectiveness, and promote

trust and safety in relation to App and Website. 'Cookies' are small files placed on your device hard-drive/storage that assist us in providing our App and Website Services. We offer certain features on our App and Websites that are only available through the use of 'Cookies'.

We also use cookies to allow you to enter your password less frequently during a session. 'Cookies' can also help us provide information that is targeted to your interests.

Most of the 'Cookies' are 'session cookies', meaning that they are automatically deleted from your device hard-drive/storage at the end of a session. You are always free to decline our 'Cookies' if your device permits, although in that case you may not be able to use certain features on the App.

We will occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, or income level). We use this data to tailor your experience at our App, providing you with content that we think you might be interested in and to display content according to your preferences.

A due diligence will be performed at regular intervals to ensure that the usage of data is consistent with the purpose for which it has been collected.

You can also post messages on our message boards, chat rooms or other message areas or leave feedback. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities on the App, we may collect such information into a file specific to you.

Log File Information

Server

Our servers automatically collect information about your device's connection to the internet, including your IP address, when you visit our Website or use the App.

App/ Browser

We automatically receive and log information from the App and/or your browser

including but not limited to IP address, your device or computer's name, and your operating system.

Device

We may also collect log information from your device, including but not limited to your location, IP address, your device's name, device's serial number or unique identification number (e.g. UDiD on your iOS device, Android ID or ADID on your Android Device), device operating system, browser type and version, CPU speed, and connection speed etc.

Sharing of Personal Information

We may share your Personal Information with our other subsidiaries/ associate companies and / or affiliates as and when required subject to the terms and conditions of this Policy. We may also disclose anonymised data derived from your Personal Information to third parties subject to the terms and conditions of this Policy.

This disclosure may be required for us to provide you access to our services including App and Website Services, to comply with our legal obligations, to enforce our user agreement, to facilitate our marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to various services rendered by us including App and Website Services. We do not disclose your Information to third parties for their marketing and advertising purposes without your explicit consent.

We may disclose your Personal Information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process. We may disclose your Personal Information to law enforcement offices, third party rights owners, or others in good faith and belief that such disclosure is reasonably necessary to: enforce Terms of Use and / or this Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public.

We and / or our affiliate(s) may share / sell some or all of your Personal Information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business. Should such a transaction occur that other business entity (or the new combined entity) will be required to follow this Policy with respect to your Personal Information.

Links to Other Platforms

Our App and/or Website may be linked to other platform that may collect personally identifiable information about you. The Company is not responsible for the privacy practices or the content of those linked platforms.

Advertisements

We use third-party advertising companies to serve ads when you visit the App. These companies may use your Personal Information about your visits to this and other websites in order to provide advertisements about goods and services of interest to you.

Security Precautions

Our App and Website has stringent security measures in place to protect the loss, misuse, and alteration of your Personal Information under our control. Whenever you change or access your account information, we offer the use of a secure server. Once your Personal Information is in our possession we adhere to strict security guidelines, protecting it against unauthorized access.

Consent (applicable only for App)

Your consent will be obtained at the time of mandatory registration process as mentioned above, which consent shall remain valid until withdrawn by you, for all the Applications / functions as mentioned within the App or displayed on the Website. You may provide your consent through a click on the tab 'I Agree' that would be displayed on your screen prior to usage of such App by you. Such acceptance would be deemed to be a valid written consent in the form of letter or any other mode as specified under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

If we decide to change our Policy, we will upload the revised policy on the Website and link the same to our App.

Choice of denial or withdrawal of consent (applicable only for App)

You will be provided with an option to decline or deny providing of data/ information if you may so desire.

Further, if at a later date, you wish to withdraw your consent given earlier; you may do so by writing to the Grievance Officer as per details provided on the website of the Company.

Information Storage and Backup (applicable only for App)

From time to time, we take backup of your data on India Shelter App on our cloud database. This is done for the purpose of enabling users to get their data back in case their phone's data becomes unusable, or device gets lost, or the user moves to a new phone device. We also use this backup to provide useful insights and information related to their spends such as weekly spends in a month, insights related to spend behaviour, etc., and to provide information related to user spends, patterns and user data in the form of aggregated and anonymized statistics on data such as user spends by category, date, time, bank balances, etc. However, no information will be retained for a longer period than required and the information so provided shall be used solely for the purposes stipulated under this Policy.

Personal Information updation/ correction

The Company shall provide the facility to the users for their review and/or correction and/or modification so that the relevant Personal Information can be updated on the App and / or Website, as the case may be.

Information Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure and destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data. All Personal Information gathered on the India Shelter App and / or Website is securely stored within the controlled database. Access to the servers is password protected and is strictly limited.

Grievance redressal

A grievance officer (name and contact details on website) has been appointed to address any discrepancies or grievances raised by you.

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