

PRIVACY POLICY

(last updated on 19/09/2024)

1. INTRODUCTION

1.1. This Privacy Policy (“**Policy**”) outlines Aditya Birla Capital Digital Limited’s (“**ABCD**”, “**we**”, or “**us**”) practices in relation to the storage, use, processing, and disclosure of your personal data that may be accessed by us or you may have chosen to share with us when you download and use our mobile application [ABCD] or use the services made available on our website [Aditya Birla Capital: Loans, Investment, Insurance Financial Service Provider in India](#) (the app and the website are collectively referred to as the “**Platform**”).

1.2. The services we offer you on or through the Platform are referred to as “**Services**”. Please note that unless specifically defined in this Policy, capitalised terms shall have the same meaning ascribed to them in our Terms and Conditions, available at [terms-conditions | Aditya Birla Capital](#) (“**Terms**”). Please read this Policy in consonance with the Terms.

1.3. At ABCD, we are committed to protecting your personal data and respecting your privacy. Please read this Policy carefully to understand our practices regarding your personal data and how we will treat it. This Policy sets out the basis on which any personal data we collect from you, we collect about you, or that you provide to us, will be processed by us.

1.4. By providing us with the consent to process your personal data, you acknowledge that we will collect, store, use, and disclose your personal data in accordance with this Policy.

2. THE DATA WE COLLECT ABOUT YOU

2.1 We collect, use, store, transfer, or otherwise process personal data about you to provide you with, or in connection with, the Services, to the extent permissible under applicable law. Such personal data includes:

(a) Identity Data: This includes data such as your first and last name, date of birth, marital status, title, gender, educational qualifications and background, employment status, organisation name, identification documents, photographs, and health and lifestyle information.

(b) Profile Data: This includes data such as your username and password, referral code (if any), purchases or orders made by you, your interests, preferences, feedback, and survey responses.

(c) Contact Data: This includes data such as your phone number, email address, and residential address.

(d) Financial Data: This includes data such as your financial information, bank account details, bank account statements, tax residency details, tax status, details relating to declarations, income details, nominee details, etc, and includes your Financial Information.

(e) Financial Information: This includes information as defined under the Master Direction- Non-Banking Financial Company - Account Aggregator (Reserve Bank) Directions, 2016 as updated or amended from time to time.

(f) Transaction Data: This includes details of transactions that may occur through the Platform or in connection with the Services, such as SMS data and details about payments to and from you and other details of products and services you have purchased from us. Please note that we only collect details of transactions contained in SMSs. We do not collect, read, or store any personal SMSs.

(g) Credit Data: This includes credit information, credit information report and/or credit scores made available by credit information companies.

(h) Marketing and Communications Data: This includes your preferences in receiving marketing messages from us and our third parties, and your communication preferences.

(i) Technical Data: This includes data such as your internet protocol address, browser type and versions, time zone settings, operating systems, device information, other technology that you use to access and use the Platform, and details of other applications installed your devices.

(j) Usage Data: This includes information about how you use the Services.

(k) Health Data: This includes information / data about your health parameters obtained through scans provided on the Platform.

2.2 We do not access your mobile phone resources such as file and media (except as disclosed above in order to enable you to upload documents), call logs and telephony functions in relation to lending services. However, we may access your camera, microphone, location or any other facility solely for the purpose of onboarding or KYC checks in relation to lending and other services, after obtaining your explicit consent. We do not collect your biometric data for offering our lending services. We shall also collect data in relation to your contact list on your device, on a 'read-only' basis, for the purposes of our payments related feature where in you can search from your contact list to initiate UPI payments to an identified contact.

2.3. We are required to collect your personal data to provide you with access to the Platform and Services. In certain cases, we are required to collect personal data as required by law, or under the Terms. If you fail to provide us that data as and when requested by us, we may not be able to perform our obligations under the arrangement we have with you or are trying to enter into with you (for example, to provide you with features of the Services). In this case, we may have to cancel or limit your access to or use of the Services (or part thereof).

2.4. We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data under applicable laws.

3. HOW WE COLLECT DATA ABOUT YOU

3.1. We use different methods, as permitted under applicable laws, to collect and process

personal data about you. This includes:

(a) Information you provide us: This is the information (including Identity Data, Profile Data, Contact Data, and Financial Data) you consent to give us when you use our Services or when you correspond with us (for example, by email or chat, or through the Platform). It includes information you provide when you register to use the Services, use a Platform feature, share data through the Platform, or any other platform, service, website or interface owned or operated by us, or when you report a problem with the Platform and our Services. If you contact us, we will keep a record of the information shared during the correspondence.

(b) Information we collect about you and your device: Each time you visit the Platform or use the Services, we will automatically collect personal data and health data using cookies and other various kinds of analytical tools such as programmes developed by Intent HQ Limited (including Technical Data), including fingerprint for the purposes of verification.

(c) Information we receive from other sources including third parties and publicly available sources: We may receive personal data, including sensitive personal data and information, about you from various third parties such as account aggregators, credit information companies, analytics providers, advertising networks, search information providers, providers of technical, payment and delivery services, and other publicly available sources. We may also collect Credit Data about you from third parties with your authorisation.

4. HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

4.1. We will only use your personal data in accordance with applicable laws. Most commonly, we will use your personal data to provide you with the Services, or where we need to comply with a legal obligation.

4.2. You agree and acknowledge that by using our Services and creating an account on the Platform, you authorize us, our associate partners, and our affiliates to contact you via email, phone, or otherwise. This is to ensure that you are aware of all the features of the Services.

4.3. In general, we use your personal data for the following purposes and activities undertaken without direct human supervision or control:

- To register you as a user of the Platform;
- To create your account and verify your identity and access privileges;
- To provide you with the Services;
- To manage our relationship with you, including notifying you of changes to any Services;
- To conduct KYC compliance processes as required under applicable laws;
- To provide you with personal finance management solutions such as detailing your bank balance, transaction analysis, budget setting, and statement downloads;
- To process payments on your behalf and on your instructions;

- To authenticate a transaction request;
- To administer and protect our business and the Platform, including troubleshooting, data analysis, system testing, and performing internal operations;
- To deliver content to you;
- To send you communication, including through SMSs, phone calls, and WhatsApp business messages, in relation to your use of the Platform or Services;
- To monitor trends so we can improve the Platform and Services, including through surveys;
- To improve our business and delivery models;
- To perform our obligations that arise out of the arrangement we are about to enter or have entered with you;
- To enforce our Terms;
- To undertake marketing services, including sending you promotional messages;
- To respond to court orders, establish or exercise our legal rights, or defend ourselves against legal claims;
- To advertise or market our other products and services or those of our group companies or third parties;
- To provide personal data provided by you to us in order for you to avail products or services of a third party, to such third parties, who may then use such personal data in accordance with their privacy policy, which shall include to process such personal data in order to send you communications, including through SMS, phone calls, WhatsApp or other communication channels to solicit their products or services;
- To carry credit checks, screening, or due diligence checks;
- To detect and protect us against error, fraud, money laundering and other criminal activities;
- To investigate, prevent, and take action against illegal or suspected fraud or money laundering activities and conduct forensic audits;
- To address your grievances, feedback, or inquiries;
- To detect, respond and recover from cybersecurity incidents; and
- To ensure compliance with applicable laws.

4.4. You understand and acknowledge that ABCD, through this Platform, acts as a Loan Service Provider (LSP) to distribute loans offered by its lending partner Aditya Birla Finance Limited, which is a non-banking finance company registered with the Reserve Bank of India and is qualified to provide such loans in terms of the extant regulations of the Reserve Bank of India. Accordingly, we may share your information with our partners for the purpose of offering you such loan products. The link where ABCD is mentioned as LSP for Aditya Birla Finance Limited is

available at <https://finance.adityabirlacapital.com/our-digital-lending-platform-partners>.

4.5. We will share your Credit Data with third parties only with your authorization.

4.6. We have partnered with account aggregators to fetch your Financial Information. You hereby authorise us to use, process and store your Financial Information (i) in accordance with the purposes specified by you in the consent artefact that you provide to the account aggregator, (ii) as permitted under applicable laws, or (iii) in a manner consistent with the Terms and this Policy.

4.7. We may assist you with availing our Services through the co-browsing feature on the Platform through which you may be able to screen-share your activities on the Platform with us. In accordance with applicable law and the consent you provide to us, we will have a one-time and remote access to the activities on your device while you screen-share. We do not record or store any personal data that we obtain through such access. You hereby authorize us to use, process, and store your personal data that we may collect through the co-browsing feature, solely to provide you with the Services.

5. HOW WE SHARE YOUR PERSONAL DATA

5.1. You hereby agree and acknowledge that any and all information pertaining to you, may be shared by us with our group companies or third parties – including financial institutions, vendors, service providers, and business partners, for the purposes detailed in this Policy, in accordance with your consent where required under applicable laws.

5.2. You agree and acknowledge that by using our Services and creating an account on the Platform, you authorize us, our associate partners, and affiliates to contact you via email, phone, or otherwise. This is to ensure that you are aware of all the features of the Services.

5.3. You agree and acknowledge that we may share data where we are required by law, any court, government agency, or authority to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or the Terms, or in order to comply with any applicable laws and regulations.

6. DATA SECURITY

We implement appropriate security measures to protect your personal data from unauthorised access, and follow technology standards prescribed by applicable laws, including the Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and directions issued by the Indian Computer Emergency Response Team.

7. DATA RETENTION AND DESTRUCTION

7.1 You agree and acknowledge that your personal data will continue to be stored and retained by us as required or permitted by applicable laws, any contracts that we may have with regulated entities, regulatory requirements, or as required for defending future legal claims.

7.2 Upon completion of the retention period for each category of personal data as described above, we shall delete or destroy, to the extent technically possible, personal data in our possession or control, or render the personal data into anonymised data, so that it no longer constitutes personal data.

8. YOUR LEGAL RIGHTS

8.1 Under certain circumstances and subject to applicable laws and the Terms, you may have certain rights in respect of your personal data such as the right to review and correct your personal data, revoke or deny consent, or request the erasure of your personal data.

8.2 If you wish to exercise any of the rights set out above, please write an email to the Grievance Officer, whose details are mentioned in Section 14 of this Policy.

9. TRANSFER OF PERSONAL DATA

Please note that all your personal data is only stored on systems located within India. We do not transfer your personal data to any third country.

10. LINKS TO THIRD PARTY WEBSITES

Our Services may, from time to time, contain services provided by or links to and from the websites of our partner networks, service providers, financial institutions, advertisers, and affiliates ("**Third Party Services**"). Please note that the Third Party Services that may be accessible through our Services are governed by their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through such Third Party Services. Please check their policies before you submit any personal data to such websites or use their services.

11. COOKIES

11.1. Cookies are small data files that are stored on your device. We use cookies and other tracking technologies to distinguish you from other users of the Services and to remember your preferences. This helps us provide you with a good experience when you use our Services and also allows us to improve the Services.

11.2. We identify you by way of using cookies. The cookies shall not provide access to data in your device such as email addresses or any other data that can be traced to you personally. The data collected by way of cookies will allow us to administer the Services and provide you with a tailored and user-friendly service. The cookies shall enable you to access certain features of the Services. Most devices can be set to notify you when you receive a cookie or prevent cookies from being sent. If you prevent cookies from being sent, it may limit the functionality that we can provide when you visit the Platform or try to access some of the Services.

11.3. Additionally, you may encounter cookies or other similar technologies on certain pages of the Platform that are placed by third parties. We do not control the use of cookies by such third parties.

12. BUSINESS TRANSITIONS

You agree and acknowledge that in the event we go through a business transition, such as a merger, acquisition by another organisation, or sale of all or a portion of our assets, your personal data may be among the assets transferred.

13. CHANGE IN PRIVACY POLICY

13.1. We keep our Policy under regular review and may amend it from time to time, at our sole discretion.

13.2. The terms of this Policy may change and if they do, these changes will be posted on this page and, where required by applicable laws, notified to you.

14. GRIEVANCE OFFICER

You may contact our Grievance Officer with any inquiry relating to loans.

Name: Akash Anchan

Address: 9th Floor, One World Center, Tower 1, Jupiter Mills Compound, 841 Senapati Bapat Marg, Elphinstone Road, Mumbai, Maharashtra, India, 400013

Email Address: abcdl.servicehead@adityabirlacapital.com

Phone Number: 022- 68323410