
MONEDO FINANCIAL SERVICES PVT. LTD.

PRIVACY POLICY

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Monedo Financial Services Private Limited, a company incorporated under the provisions of the Companies Act, 1956, having its registered office at 07th Floor, Part A, Corporate Centre, Andheri Kurla Road, Andheri (East) Mumbai 400059, Maharashtra and having corporate identity number U65100MH2017PTC294521 (hereinafter referred to as “**MFS**”/ “**We**”/ “**us**”), is committed to upholding the privacy and security of the Personal Information (as defined below) supplied by every Customer (as defined below) (either directly to MFS or on the web based application (as defined below) through the LSP (as defined below) / the MFS Representative (as defined below), as the case may be).

The objective of the web-based application for MFS is to check your preliminary eligibility for the Facility (as defined below), and your subsequent onboarding, if applicable.

This Privacy Policy provides you with the details about the manner in which your data is collected, and then subsequently stored and used by us. You are advised to read this Privacy Policy very carefully.

1. Definitions

For the purposes of this Privacy Policy, the following words and expressions used herein, shall have the following meanings respectively:

“**Web based Application**” means MFS’s application/software program, as may be updated / modified from time to time and as may be used and accessed by the LSP(s) / MFS Representative, as the case may be, on any compatible device, in relation to any Facility sought to be availed by you;.

“**CIC**” or “**Credit Information Company**” means an entity which has been granted a certificate of registration under sub-section (2) of Section 5 of the Credit Information Companies (Regulation) Act, 2005;

“**Customer**” / “**You**” means any person being a existing or potential customer / borrower of MFS who is desirous of availing any Facility(ies) offered by MFS for purchasing any Product(s) or for personal use. The term “your” shall be construed accordingly;

“**Customer Data**” means, collectively and individually, any and all data or information obtained with consent from your mobile device like device location, device information (including storage, model, installed apps, wifi, mobile network) transactional and promotional SMS, communication information including contacts and call logs, log application data caches, IP address, log information like your search queries.

“**Facility**” means any services and/or products, including any loan, financial assistance facility, or credit line, offered by MFS, including but not limited to any consumer loans / credit facilities;

“**Indicative Amount**” shall mean the tentative amount, as determined by MFS at its sole discretion, which the Customer may be preliminarily eligible for under the Facility, on an indicative basis. It is clarified that this Indicative Amount is only an estimate, and is subject to final assessment and approval by MFS at its sole discretion;

“**LSP**” means the LSP / store owner engaged in the business of selling various Products at its stores, and from whom you wish to purchase such Product by availing MFS’s Facility;

“MFS Representative” means a Representative of MFS’s engaged by it to carry out the assessment of the Customer’s request for a Facility, and to undertake the subsequent onboarding of such Customer, if applicable;

“Representative” means any employee, official, personnel, representatives, service provider, agents, or contractors, whether third party or otherwise, that are employed or engaged by MFS;

“Personal Information” shall have the meaning assigned to it in Clause below;

“Product” means any products and/or services (including but not limited to consumer durable, healthcare reimbursement financing, purchase of electric vehicles, supply chain financing and digital products) which are offered for sale / being sold / may be sold by the LSP.

2. User acceptance

By accessing or using the web-based application or by availing our services, you agree to the terms of this Privacy Policy. The collection, use, processing, storage, retrieving, disclosure, or transfer of your information, including personal information and sensitive personal data or information (Collectively, **“Information”**) will be in accordance with this Privacy Policy and as required or permitted under applicable laws, including but not limited to the Information Technology Act, 2000 and the rules frames thereunder, as may be amended from time to time (**“IT Laws”**) and the regulations, directions, circulars, guidelines or other mandates issued by the Reserve Bank of India (**“RBI”**) and as applicable to the services (collectively, **“Applicable Laws”**)

Any Information, which is the subject matter of this Privacy Policy, provided by you or otherwise collected by Us is collected and retained by Monedo Financial Services Private Limited, a company incorporated under the provisions of the Companies Act, 1956, having its registered office at 07th Floor, Part A, Corporate Centre, Andheri Kurla Road, Andheri (East) Mumbai 400059, Maharashtra.

Note: If you do not agree to the terms of this Privacy Policy or any part hereof), kindly do not share any information with the LSP / MFS Representative, as the case may be to be uploaded on the web-based application.

Monedo shall obtain borrower’s consent in writing before collecting both mandatory and non-mandatory information for providing Services. Borrower is expected to provide correct, complete and updated information to Monedo. Any information obtained from the borrower are solely for the purposes of the terms and conditions of the services provided by Monedo.

Borrower has an option to agree or disagree to provide non-mandatory information as stated in this policy and to use any information for the purpose other than terms and conditions of the Services. Borrower can at any time withdraw the consent as provided, by writing to us at Monedo Financial Services Private Limited, 07th Floor, Part A, Corporate Centre, Andheri Kurla Road, Andheri East, Mumbai 400059 or e-mail at care@monedo.in and making a request for termination of the services agreed as per the terms of use.

Please read the privacy policy carefully before using or registering on the Platform or accessing any material, information or services on the Platform. By sharing any information with the LSP / MFS

Representative, as the case may be, to be uploaded on the web-based application (including the consent code sent to your mobile phone number along with this Policy), you expressly confirm that:

- A. you are desirous of availing a Facility from MFS for purchasing certain Product(s);
- B. you have read, understood and agree with this Privacy Policy, and provide your express agreement and consent to be bound by all the terms and conditions under this Privacy Policy, same may be amended from time to time; and
- C. you authorise MFS and its Representatives to contact you regarding the Facility through any through any Communication Mode (as defined below).

The website www.monedo.in is owned and operated by Monedo Financial Services Private Limited (the “**Company**”) adheres strictly to information technology and data protection laws, rules and regulations. This Privacy Policy also specifies the manner in which sensitive personal data or information (*if any*) is collected, received, stored, processed, disclosed, transferred, dealt with and handled by the Company in relation to your use of the application.

Capitalised terms not defined in this Privacy Policy will have the meaning as set out in terms and Conditions.

3. Information We collect

MFS uses the Information collected from you or about you to enable you to receive Services on the web or other means. MFS may collect the following Information and you hereby explicitly consent to the following:

a. Account Information:

When you set up your account on the Portal, we collect your Information, such as your first and last name, address details, photo, email addresses, and telephone numbers.

b. Identity:

MFS collect identity and Know Your Customer ("KYC") related Information to verify your identity and comply with the customer identification procedures and customer due diligence requirements prescribed under Applicable Laws, such as Permanent Account Number (PAN), photo, Aadhaar related Information (including last four digit of Aadhar, demographic details or Virtual ID) for the purposes of e-KYC authentication with the Unique Identification Authority of India (“UIDAI”) and One Time Password / Pin (OTP). Please note that e-KYC authentication and submission of Aadhaar information is not mandatory, and you may submit other identity documents in place of Aadhaar information, to verify your identity as stipulated under KYC Directions, 2016 issued by the RBI.

c. Information to assess credit worthiness:

(a) Salaried individuals: Employment related Information, such as name of the employer, salary, offer letter, employment ID, and email address issued by the employer;

(b) Self-employed: Information related to the self-employment, such as profession, social media links related to your work, work location and income.

d. Financial Information:

We may collect certain financial Information (such as bank account details or other payment instrument details), rental/lease agreement, gas bill, service or transaction related communications for providing the Services.

e. Device:

We may collect Information related to the electronic device you use to access the services, such as your devices' internet protocol (IP) address, browser type, operating system, software, device type, device ID, device international mobile equipment identity (IMEI) and date and time at which you visit the Portal or avail the Services. This helps Us learn about and verify your identity as well as detect and prevent fraud.

f. Usage of the Portal:

We may collect Information that you may electronically submit when you post on message boards, or information contained in searches, reviews, ratings or comments that you submit or Information about you from other persons or sources, or the details of your visits of the website or usage behaviour on the Portal. Such Information may be used by Us to administer the Portal and compute general statistics regarding the use of the Portal. We may also use this Information to share important or relevant updates and information through email and/or SMS, and also prevent communication that might not interest you.

g. SMS:

We may need access to the SMS functionality in your device for the purposes of onboarding you in relation to certain services on your device. We may periodically collect transactional SMSs for the purpose of provision of Services. You may have restricted access to the Portal or the Services available through the Portal, if you disable, withdraw or do not provide this access.

h. Camera and microphone:

We may require access to your device's camera and microphone for a seamless experience, for clicking your selfie, to upload photos, or recording your audio/video, for verification or onboarding / KYC purposes, or for uploading any other necessary documents on the Portal.

i. Location:

We may collect and monitor your location to verify your current address, offer you customized promotions, ensure and check serviceability of Services and to prevent any fraudulent activity. We collect the location data from you in two ways: (i) when you add your pin code on the Portal; or (ii) when you enable such access from your mobile device. We collect this data only when Our Portal is being used. You may have restricted access to the Portal and/or Services available through the Portal, if you disable/withdraw/do not provide this access.

j. Storage:

We may require permission so that your documents can be securely downloaded and saved on your phone, and so you can upload any required documents as part of using the Services. This helps in providing a smooth and seamless experience while using the Portal.

k. Feedback Data and Other Data:

We may access and save Information in the following instances:

(a) When you contact us or we contact you, we may record Information provided by you during such communications or record calls for quality and training purposes.

(b) When you provide any feedback or comments to us on the Portal or any other platform.

I. Third Party Information:

We may also work closely with Affiliates (defined below), third party business partners, technical sub-contractors, analytics providers, search information providers, credit information companies, account aggregator etc. and may lawfully receive Information about you from such sources. Such Information may be combined with Information collected on the Portal and such other Information as provided in this Policy.

m. Other Information:

We may also collect your Information via other sources, such as delivery address or contact Information from Our Affiliates and partners, Information from Our payment service providers, public records, publicly available sources or internet sites, vendors, data suppliers and service providers, commercially available marketing lists or registries, telephone directories, social network, news outlets and other related media.

n. Information Collected from You

In order for MFS to carry out your eligibility check for an Indicative Amount under the Facility and if applicable, onboarding, or for MFS to render the services to you, the MFS Representative, may ask you to provide certain Personal Information for it to be uploaded on / entered into the Application. You are under no obligation to provide the Personal Information that is asked for unless mandatory. However, please note that if you do not provide information, MFS will not be able to check your eligibility for an Indicative Amount.

o. Documents Required

In order for us to evaluate your request for a Facility and to determine the Facility limit that we may consider granting to you, you shall be required to submit self-attested photocopies the following documents for our review:

(a) PAN Card (mandatory); and

(b) either of the following documents containing your address (mandatory): Aadhaar card (masked), Valid Driving License, Valid Passport or Voter ID; and

(c) Further, MFS may also ask for the following additional documents (wherever applicable): Latest Salary Slip, Bank Statement, Bank Passbook, Post-paid Mobile bill, Landline or broadband bill, Rent Agreement, property tax receipt, Water bill, ration card, LPG connection receipt, Gas Bill (LPG/PNG), or any other document.

The aforementioned details shared by you shall be used and maintained as per the terms of this Privacy Policy.

4. Use of Personal Information

- a) The use of your Personal Information is subject to the Privacy Policy in effect at the time of our use.
- b) We will process your Personal Information for the following purposes:
 - i. We use Personal Information to confirm your eligibility for the Facility(ies) that you have approached the LSP / MFS Representative, as the case may be, for, or may have explicitly requested MFS for, or to resolve disputes, troubleshoot concerns, help promote safe services, assess your interest in our services, inform you about offers, products, services, updates, to customize your experience, detect and protect us against errors, fraud and other criminal activity, enforce our terms and conditions;
 - ii. We may also use your Personal Information to send you offers regarding various product, services and / or facilities which MFS or its affiliates may, from time to time, offer. We may occasionally also ask you to complete optional online surveys. These surveys may ask you for your contact information and demographic information (like zip code, age, gender, etc.). Should you choose to take such survey(s), we may use this data to customize your experience at MFS. You hereby provide us your express consent to use your Personal Information to contact you with offers and ask you to take surveys, as mentioned above;
 - iii. to make MFS's services available to you and to further optimize and develop;
 - iv. to create usage statistics;
 - v. to assess and improve your user/customer experience;
 - vi. to be able to recognize, prevent and investigate attacks;
 - vii. to communicate with you;
 - viii. to enforce our terms and conditions;
 - ix. to comply with legal obligations; and
 - x. as otherwise described to you at the time of collection of your Personal Information.

We endeavour to collect only such information that is reasonably necessary for us to perform the desired function. We will not use your Personal Information for any purpose other than in connection to the Facility requested / availed by you, or for enforcement of your obligations in relation to the Facility or as otherwise set out in this Privacy Policy.

5. Disclosure

MFS will not use or share your Personal Information and will not disclose the same to any third party(ies), save and except in the following events;

- as set out in this Privacy Policy;
- otherwise, where it is pursuant to obtaining the Customer's permission;
- where it is in connection with a disclosure to financial institutions and banks, in which case, the Customer hereby gives his / her / its express permission to MFS for such disclosure;
- where it may become necessary for MFS to disclose the Personal Information to its Representatives (including MFS Representative), agents, other service providers and contractors (which includes but is not limited to KYC repository service providers, data storage agencies, marketing and collection agents, any assigns to whom MFS intends to grant any right or obligation of MFS) or the LSP, in each case, on a need basis, in the course of normal business operations or otherwise for rendering services to the Customer, to facilitate MFS in providing the services and Facilities to its customers. The aforesaid persons shall be informed by MFS that the Personal Information shall not be used for any purpose except as mentioned herein;
- where it is in connection with the services being rendered;
- where it is to help investigate, prevent or take action regarding unlawful and illegal activities, suspected fraud, potential threat to the safety or security of any person, violations of any provisions of the Terms of Use, or as a defence by MFS against legal claims;
- where it is a case of special circumstances such as compliance with court orders, requests/order, notices from legal authorities or law enforcement agencies compel us to make such disclosure;
- where it is required to be disclosed pursuant to any law, regulation, rule or any regulatory or statutory compliance;
- where it may also be disclosed to a third party as part of any organizational restructuring; and/or
- with other entities affiliated with us primarily for business and operational purposes. As far as this is necessary for the purposes set out above, we will transfer your Personal Information to the following recipients:
 - IT service providers or third-party service partners that we use;
 - Public authorities (which includes government agencies, law enforcement and other public authorities which may include such authorities outside your country of residence.)
- We may use a third-party service provider to assist us with some features. Our service provider will receive your Personal Information on our behalf and will not be permitted to use it for any other purpose other than as specifically provided under this Privacy Policy.

We only transfer your Personal Information to recipients that have an adequate level of data protection, or we take measures to ensure that all recipients provide an adequate level of data protection.

6. Terms regarding KYC and CIC

- The Customer hereby gives its express consent to MFS to (directly and / or through its Representatives) search, download, upload/share information with the Central KYC registry, and

further consents to receiving information through SMS/e-mail on the mobile number/e-mail id of the Customer registered with MFS, for the purpose of KYC compliance.

- The Customer further gives its express consent to and authorises MFS:
 - a) to obtain and / or submit the Customer's information (including Personal Information) from / to Credit Information Company and/or information utility and/ or such institution set up under the provisions of law from time to time, as and when required;
 - b) for obtaining/authenticating/verifying the Customer's KYC details from CERSAI C-KYC portal / Aadhaar e-KYC / National Securities Depository Limited (NSDL) / any other service provider/ organization as deemed fit by MFS, in relation to the facilities / services offered by it and permitted by the Reserve Bank of India. The Customer understands that as per directions of the Government of India, its KYC information may be created / updated by MFS in Central KYC Registry;
 - c) to use its Aadhaar Number and/or biometric/demographic information to verify its details from UIDAI. The Customer also provides its consent for e-KYC/offline verification for considering the current address of residence, if the said address is different from the address updated in Aadhaar. The Customer further authorizes and gives its consent to MFS to share and disclose any/all information as received KYC from UIDAI/information furnished by the Customer with credit bureaus/statutory bodies/subsidiaries/affiliates/Credit Bureaus/Rating Agencies, services providers, banks/financial institution, governmental/regulatory authorities or third parties for KYC information verification, credit risk analysis, or for other purposes in relation to the Facility availed / to be availed by the Customer.

7. Cookies

When you visit the Portal, one or more cookies will be sent to the device being used by you to access the Portal. The cookies are either used to improve the quality of the Portal or for storing your preferences as a user, improving search results and tracking user trends. You have the option of disabling cookies via your browser preferences on your device. However, if you disable cookies on your browser, some parts of the Portal may not function effectively.

8. Password Policy

Do help us protect your privacy by maintaining the confidentiality of the username and password (if you use the same for any of our services).

9. Retention of Data

We are required under applicable laws to retain certain records for a period of at least 5 (five) years after closure of your MFS account, which will include your personal data such as your name, contact details, customer number and transaction history, etc. ("**Retained Data**"). We will, in any case, retain your Personal

Information for as long as there are statutory retention obligations or until potential legal claims are not yet time-barred. Other than the Retained Data, we will delete and destroy all Personal Information that we hold about you when you (or we) terminate your MFS account.

We do not ask for or store your online banking login PIN, TAN and/or password. Please do not share the same with the LSP or with any MFS Representative, as the case may be.

10. Information of Children

We do not knowingly solicit or collect Information from children under the age of 18 years. Use of the Portal is only available for persons who can enter into a legally binding contract under Applicable Laws.

11. Changes to this Privacy Policy

We reserve the right to change, modify, insert, or delete any provision of this Privacy Policy, from time to time, in our sole discretion, without any prior notice to you.

We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. Your use of the Portal or availing the Services after an updated Privacy Policy becomes effective will indicate your acceptance of the updated Privacy Policy.

12. Contact Us

If you would like to ask about, make a request relating to, or complain about how We process your information, please contact or email Our grievance officer, at one of the addresses below. Our grievance officer will attempt to expeditiously redress your grievances.

For any request, complain, feedback or grievances, please contact: -

Principal Nodal Officer

Name: Pranabh Kapoor

Address: 07th Floor, Part A, Corporate Centre, Andheri Kurla Road, Andheri (East) Mumbai 400059, Maharashtra

Email id: pranabh.kapoor@monedo.in