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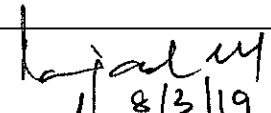
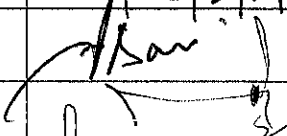
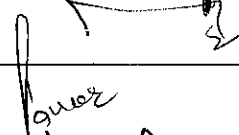

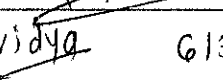
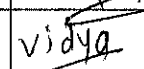
BY.....

FULLERTON INDIA CREDIT COMPANY LTD

## Privacy Policy

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<b>Policy Title</b>	Privacy Policy
<b>Policy Owner</b>	Compliance
<b>Effective Date</b>	March 2019
<b>Review Cycle</b>	Annual Review
<b>Policy Version</b>	V1.0 Mar 2019
<b>Reviewed by External Consultant</b>	Vinod Kothari and Co.
<b>Approved by</b>	Board of Director

Level	Name	Designation	Date & Sign
Recommended by	Rajashree Nambiar	MD and CEO	 8/3/19
Reviewed by	Ekhlaque Bari	Chief Technology Officer	
Reviewed by	Sunil Kaw	GM, Risk	
Reviewed by	Pankaj Malik	CFO & Company Secretary	
Reviewed by	Nitin Nimbalkar	Chief Information Security Officer	
Prepared by <i>FOV</i>	D Krishnaraj	SVP– Compliance	 vidya 6/3/2019

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## 1. Background

Section 43A of the Information Technology Act, 2000 read with Rule 4 of the Information Technology (Reasonable Security Practices & Procedures & Sensitive Personal Data or Information) Rules 2011<sup>1</sup>, requires anybody corporate to provide policy for privacy and disclosure of information if any. The body corporate or any person who on behalf of body corporate collects, receives, possess, stores, deals or handle information of provider of information, should provide privacy policy for handling of or dealing in personal information including sensitive personal data or information and ensure that the same are available for view by such providers of information who has provided such information under lawful contract. Such policy should be published on website of the body corporate.

At Fullerton India Credit Company Ltd (hereinafter referred to as “Fullerton India” which term shall include its successors) we are strongly committed to protect the Personal information, including but not restricted to, Sensitive Personal and Financial Information that customer submits to us and we would endeavor to protect it from unauthorized use.

## 2. Definitions

**Personal Information:** means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

**Sensitive Personal and Financial Information:** means such personal information that is otherwise not available to anyone except the customer, such as password, financial information, sexual orientation, medical records, biometric information, physical, physiological and mental health condition. Such information is generally not available in public domain.

## 3. Collection of Information

In the course of using the website of Fullerton India or availing the products and services vide the online application forms and questionnaires, Fullerton India may become privy to the personal information of its customers, including information that is confidential in nature.

Such information may include, but not be limited to the following: Name, date of birth, demographic details, financial details, family details, banking relationships etc.

Fullerton India also collects information in hardcopy through loan applications and supporting documents. The supporting documents are collected as per Know Your Customer (KYC) guidelines issued

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<sup>1</sup> [http://meity.gov.in/sites/upload\\_files/dit/files/GSR313E\\_10511\(1\).pdf](http://meity.gov.in/sites/upload_files/dit/files/GSR313E_10511(1).pdf)

by Reserve Bank of India and other documents like statement of accounts, financial statements etc. for the underwriting purpose. Some of these documents and the information extracted from the documents are also stored in the electronic form. Fullerton would also collect information to deliver, promote or market Fullerton's products or services in connection with an existing or potential business or employment relationship with you.

Cookies: Fullerton India will use small bits of data called "cookies" stored on user's computers to stimulate a continuous connection. "Cookies", enable to store information about customer preferences, IP address, and passwords and allow customer to move to different pages of its secure website without having to re-enter password information. Any information collected is stored in secured databases protected by a variety of access controls and is treated as confidential information by Fullerton India.

#### 4. Use of Personal Information

Fullerton will use your personal data in the following circumstances:

- a. We need to perform the contract we are about to enter into or have entered into with you.
- b. It is necessary for our legitimate interest and your interest and fundamental rights do not override those rights
- c. We need to comply with legal, statutory or regulatory obligations

Fullerton India may use the personal information collected to improve its services to customer and to keep the customer updated about its new product offerings or any other information that may be of interest to the customer.

Generally, we do not rely on consent as a legal basis for processing Customer personal data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw the consent to marketing at any time by contacting Fullerton India at [namaste@fullertonindia.com](mailto:namaste@fullertonindia.com).

We will only use your personal information data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If customer wishes to get an explanation on the purpose, please contact us.

#### 5. Transfer of Information:

Fullerton India may share this information with individuals and body corporate in the course of normal business operations, such as providing services customer has subscribed for, and any activity related to these services such as collection of fee. It may become necessary for Fullerton India to disclose customer's personal information to its agents and contractors in the course of normal business

operations for the above referred purpose. However, these parties would be required to use the information obtained from Fullerton India for such purposes exclusively. Fullerton India would ensure that the third parties receiving any sensitive personal data or information from body corporate or any person on Fullerton India's behalf also do not disclose it further. Fullerton India would also endeavor that these third parties maintain the same level of data protection that is adhered to by it.

Fullerton India will endeavor to take all reasonable steps to ensure that the confidentiality of customer information is maintained by imposing strict confidentiality standards on all the third parties to whom it discloses such information. Fullerton India would build-in the necessary covenants for the outsourcing arrangements that are material in nature.

Fullerton India would transfer customer's information only if it is necessary for the performance of a lawful contract between itself and the customer as consented by the customer for data transfer.

The customer authorizes Fullerton India Limited to exchange, share, part with all information related to the details and transaction history of the customers to its affiliates / subsidiaries / banks / financial institutions / credit bureaus / agencies/participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis and credit scoring, verification or risk management and shall not hold Fullerton India liable for use or disclosure of this information.

Fullerton India may collect card payments through a PCI DSS compliant partner and the customers may contact Fullerton India if an email/SMS confirmation was not received within 48 hours for any payment made through a card swipe.

## **6. Data Security**

Fullerton India is strongly committed to protecting the privacy of its customers and has taken all necessary and reasonable measures to protect the confidentiality of the customer information and its transmission through the world wide web and it shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Commitment or in terms of the agreements, if any, with the customer.

We will limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

Customers are responsible for maintaining the security of your account credentials and other authentication involved in obtaining access to password-protected or secure areas. Fullerton will not bear any liability in respect of such unauthorized use of your account.

## 7. Data Retention:

We retain the information for as long as necessary to fulfill the purposes for which you have provided the information, including for the purpose of satisfying any legal, accounting or reporting obligations and similar essential purposes. To determine the appropriate retention period, we consider the nature and sensitivity of the personal data and the purpose.

You have the right to review the information provided and correct or amend any personal information or sensitive personal information if found inaccurate.

We have appointed a Grievance Officer to redress the grievances or provide information in relation to this privacy policy expeditiously, but within one month from the date of receipt of such grievance.

Designation: Compliance Officer

Email address: [privacy@fullertonindia.com](mailto:privacy@fullertonindia.com)

Postal address: Fullerton India, Supreme Business Park, Supreme City, Powai, Mumbai – 400 076

## 8. General

8.1 Exclusions from Privacy Policy: Other websites that customer may access via Fullerton India website may have different privacy policies and access to such web sites will not be subject to this privacy policy. Fullerton India recommends that customer to read the privacy statement of each such website to find out how they protect customer personal information.

8.2 Amendments: Due to changes in legislation or enhancements to functionality and content on the website, Fullerton India may make changes to privacy policy (without being obliged to do so) and would reflect those changes in this privacy policy statement. Hence customers are requested to go through the privacy policy statement on a regular basis.

8.3 Non-Binding: Please note that this privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

8.4 Prohibited Actions: While using the website of Fullerton India, customer agrees not to, by any means (including hacking, cracking or defacing any portion of the Site) indulge in illegal or unauthorized activities including the following:

- Restrict or inhibit any authorized user from using this Site.
- Use the Site for unlawful purposes.
- Harvest or collect information about Site users without their express consent.
- "Frame" or "mirror" any part of the Site without our prior authorization.
- Engage in spamming or flooding.

- Transmit any software or other materials that contain any virus, time bomb, or other harmful or disruptive component.
- Remove any copyright, trademark or other proprietary rights notices contained in the Site.
- Use any device, application or process to retrieve, index, "data mine" or in any way reproduce or circumvent the navigational structure or presentation of the Site.
- Permit or help anyone without access to the Site to use the Site through your username and password or otherwise.

## 9. Review of the Policy

The Policy should be subjected to an annual review by the management and modifications, if any warranted, should be taken up for the approval of the Board. If there are any amendments in the regulations, revision in the policy should be staged for Board's approval in the immediately ensuing Board Meeting, after the amendments are notified by the regulator.