



Navadhan Capital Private Limited

## Privacy Policy

V 1.0

<b>Proposed by</b>	<b>Recommended by</b>	<b>Approved by</b>
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Head – IT	Head – Products & Risk	MD & CEO

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**Version History**

<b>Version</b>	<b>Board Approval Date</b>	<b>Change Details</b>
1.0		Original Draft

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## 1. Policy Context

At Navadhan Capital Private Limited (“Company”), we regard the customer privacy, confidentiality and security of their personal information that resides with the Company. It is the policy of the Company to keep the personal information of customers secure and use the same solely for the activities related to the Company. The Company has adopted the privacy policy aimed at protecting the personal information provided by / disclosed by the customers (the Policy). This Policy governs the way in which the Company collects, uses, discloses, stores, secures, and disposes of personal information and sensitive personal data or information.

## 2. Policy Objective

The objective of the policy is to secure use of customer data and setting a standard for data privacy. This policy is framed in compliance with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules 2011 (the “IT Rules”) contained in the Information Technology Act 2000, which mandate that any “body corporate or any person who on behalf of body corporate collects, receives, possess, stores, deals or handle information of provider of information, shall provide a 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”.

## 3. Definitions

"Personal Information" (PI) means any data or information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available can identify such person.

“Sensitive Personal Data or Information” (SPDI) of a person means such personal information which consists of information relating to:

- Password
- Financial information such as Bank account or credit card or debit card or other payment instrument details
- Physical, physiological, and mental health condition
- Sexual orientation
- Medical records and history
- Biometric information

Provided that, 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 shall not be regarded as sensitive personal data or information for these purposes.

## 4. Policy Applicability

The Company collects Personal Data or Sensitive Personal Data or Information from multiple sources, which includes the following sources:

- Data declared by the Persons either as part of their discussions with Company officials or through the application form submitted by them to the Company.
- Data submitted by the Persons through the website of the Company.
- Data collected from third party sources including, but not limited to, credit bureaus, other banks or financial institutions, etc.

The Company collects the PI and SPDI from its customers and uses the same for specific business purposes or for other related purposes designated by the Company or for a lawful purpose to comply with the applicable laws and regulations. The Company is committed to ensuring that such Personal Information is duly protected

and is not used against the interests of the providers of such Personal Information nor is it shared with any Third Parties without the consent of the providers of such Personal Information.

The authenticity of the personal information provided by the customer shall not be the responsibility of the Company. The Company shall not be responsible for any information that is freely available or accessible in public domain or furnished as per law for the time being in force.

## 5. Disclosure of Personal Information

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

- where the disclosure has been agreed in a written contract or otherwise between the Company and the customer
- where the Company is required to disclose the personal information to an affiliate / third party / service provider on a need-to-know basis, for providing services / related activities, provided that in such case the Company shall inform such affiliate / third party / service provider of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of the Company.
- To statutory and regulatory authorities on their specific request as per rules in force.

## 6. Data Security Practices and Management

The security of personal information is a priority and is protected by maintaining physical, electronic and procedural safeguards that meet applicable laws. The Company 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. Employees shall be trained in the proper handling of Personal Information or Sensitive Personal Data or Information.

The electronic information shall be entered into the system and maintained in the servers of the Company. The Company may host these servers in the Company's premises or use the services of reputed third-party service providers for hosting such servers. Such files / electronic data shall be stored in a safe and secure manner. The servers shall contain the data of both active and closed accounts. Such data shall be maintained for the timelines as stipulated under various laws and regulations.

## 7. Update to Policy

The Company shall review and update this policy on a need basis. This Policy is subject to change without notice. The final version of the policy will be available on the Company's Website and Customers are advised to review this Privacy Policy every time the Company's Website is used by them. Customers are also advised to review this Privacy Policy before submission of Personal Information or Sensitive Personal Data or Information with any of the Company's officials.

## 8. Grievance Redressal Mechanism

In accordance with the relevant provisions of the Information Technology Act, 2000 and Rules, customer can contact Grievance Cell with respect to any complaints or concerns including those pertaining to breach of Navadhan's Terms of Use, Privacy Policy and other policies or questions as under:

**Email ID:** care@navadhan.com

**Contact Number:** +91- 8655997899

The Grievance Officer can be contacted between 10:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays.

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