

## **PRIVACY POLICY**

Vivamoney Solutions Limited (**"Vivamoney"** **"we"**, **"our"**, **"us"**), a company registered under the Companies Act, 2013, is a company incorporated in India bearing CIN No. U67100HR2022FTC108681, having its registered office in Gurgaon, India and its corporate office at BHIVE Workspace, No.467/468, Shri Krishna Temple Rd, Indiranagar 1st Stage, Bengaluru, Karnataka – 560038. Vivamoney is a Personal Line of Credit App that offers a credit line. The App's goal is to make it easier for users to apply for a credit line by guiding them through the entire process. Further, the user can withdraw from the approved credit limit and repay either within the Grace Period at 0% Interest or split it into EMI using the App itself. Vivamoney provides its products and services to you by partnering with its lending partner **Fincfriends Private Limited**, which is registered with the Reserve Bank of India ("RBI"). Vivamoney is a part of Digital Finance International group.

Vivamoney recognises the importance of maintaining your privacy and is committed to protecting the privacy and security of your personal information. We value your privacy and appreciate your trust in us. This Policy describes how we collect, store, use, disclose, transfer and process your Personal Information including Sensitive Personal Information when you access the App or Platform and create an account with us (**"Account"**). You are advised to read the Privacy Policy carefully and accept the terms of this Privacy Policy before using the services offered by us. By accepting this Privacy Policy, you signify that you have read, understood and agree to be bound by this Privacy Policy.

For the purposes of this privacy policy the term "User(s)" and wherever the context so requires "You", "Your", "Yourself" shall mean any natural or legal person who accesses or uses the Platform.

### **1. INFORMATION WE COLLECT**

We may collect personal information that you voluntarily provide to us. **"Personal information"** refers to any information that identifies or can be used to identify an individual. **"Sensitive Personal Information"** means any Personal Information of an individual, that requires more protection due to its nature. It typically includes information that, if disclosed or mishandled, could result in harm, discrimination, or undue intrusion into an individual's privacy. It consists of information relating to financial information such as bank account details, credit card numbers, financial transactions and income details; health and medical Information like physical or mental health conditions, or information related to disabilities; biometric data including facial recognition data, and other biometric identifiers used for authentication or identification purposes; religion information; information pertaining to an individual's gender identity, etc.

We may collect, store, use, disclose, transfer and process your Personal Information including Sensitive Personal Information which includes but is not limited to:

- i) Contact information:** Full Name, User ID, permanent and current address, email address, phone number, city of residence, pin code.

- ii) Identification information:** Permanent Account Number (PAN), Aadhaar card number, passport details, Voter ID card, date of birth, photograph.
- iii) Financial information:** Income, employment status and details, credit history, bank account number and bank account bank account data including E-Mandate/E-NACH, NEFT, IMPS and UPI ID details, bank statement, information and details of either credit or debit card, salary and income details.
- iv) Demographic information:** Age, gender, nationality, religion.
- v) Credit Information:** Credit Reports, credit scores, payment history, credit inquiries, any public record of credit including but not limited to bankruptcy, court litigation, or other legal actions that may impact an individual's creditworthiness.
- vi) Transactional information:** Mode of payment, amount of the transaction, services and products availed, payment gateway ID, any other information received by us through banks, third-party providers including merchants and partners.
- vii) Usage and device information:** IP address, MAC address, domain server, interaction with App/Website, type of device, application type, versions and configurations, the brand of the device, pages visited, features used, operating systems, geo-location information.
- viii) Marketing and Communication records:** Any communication with customer service including emails, call recordings, chat logs, information about promotions, surveys, campaigns, subscription or withdrawal from getting any marketing materials.
- ix) Phone Data:** Camera, microphone, location, tracking activity while using App/Website, cellular network, SMS data (non-personal information) including but not limited to transactional communication with bank, credit or debit information
- x) Any other information voluntarily provided by you.**

For usage of camera, microphone, location and tracking activity and collection of information, explicit consent will be obtained from you for the purposes of KYC verification or account opening purposes. This activity is carried out to minimize fraudulent activities by verifying you and your address which prevents any other individual on your behalf using your personal information.

In the event you associate Loan account managed by us with an account maintained with any third party to enable us to access certain information maintained in such third-party managed accounts, you agree that we may collect, store and use such information in accordance with this Privacy Policy. We will not be responsible if you click any of the links to any third-party websites, extra plug-ins and

information and allow third-party to collect and transmit your personal information. You must ensure to be careful before providing any personal information to any third-party as any information collected by a third party in this manner is subject to that third party's own data collection, use and disclosure policies.

## **2. HOW IS THE INFORMATION COLLECTED**

We use various methods to collect and transmit your personal information, including:

### **i) Collection of information directly from you-**

- a) Information provided to us by you which is required to complete loan application form which captures the personal and financial information, including name, address, contact information, email address, employer name, job position, income, bank account information and the purpose of the loan.
- b) Information received to us through documents submitted by you for verification purposes, including but not limited to PAN card, Aadhaar card, any proof of address like utility bills, rental agreements, bank statements, pay stubs, tax returns, or other relevant financial records.
- c) Any information provided to us when you engage in direct communication with us for availing our services; connecting with customer care support; signing of loan agreement; registering for our promotional and marketing material; use and access to our App or/and Website; one time access provided by you to your Phone Data.

### **ii) Collection through publicly available source or any third-party-**

- a) Any credit information received after performing credit checks to assess an individual's creditworthiness and determine their eligibility for the loan offered. This may include accessing credit reports from credit bureaus, which contain information about an individual's credit history, outstanding debts, payment behavior, and credit scores.
- b) Information from various merchants, payment service providers, market, payment partners and aggregators and financial institutions.
- c) Any third parties which are within the group of companies of which Vivamoney is a part of including its affiliates and subsidiaries (<https://digitalfinance.com/>).
- d) Information collected from social platforms and networks provided to us through a cookie permissible by you.

- e) Information collected from publicly available sources in accordance with applicable laws of India including but not limited to reviews, comments, posts, messages on an App Store.

### 3. USE OF YOUR PERSONAL INFORMATION AND PURPOSES

- i) For loan assessment and decision-making:** We need to assess eligibility for the loan through the personal data provided by you. We use factors such as income, employment status, creditworthiness, etc. to determine whether to approve or deny the loan application.
- ii) For verifying, validation and authentication:** The personal data provided is verified and validated to ensure its accuracy and authenticity and for doing KYC evaluation and risk assessments. The data may be used to cross-check information with relevant authorities, verifying supporting documents to confirm the individual's identity and other relevant details.
- iii) Internal risk management:** Personal data collected from you is used to evaluate the level of risk associated with lending of loans. This is necessary to improve our services, reduce fraud rates, build risk models, etc.
- iv) For processing loan and transactions:** We process the personal data collected from you is used to facilitate the processing and disbursement of approved loans. This will include activities such as creation of loan agreements, maintaining records of loan, availing credit facilities including initiating fund transfers, making repayments, etc.
- v) For providing services and customer support:** We need to communicate regarding loan application status, provide updates, and address any queries or concerns. The information also enables our lenders to provide customer support throughout the loan application process. We also use your Personal Information to market our products and services including products and services of our business partners, independent service providers and /or our group entities and to notify you about events, offers, sponsorships, marketing programmes and similar marketing campaigns.
- vi) For marketing our products and services:** We use your Personal Information to market our products and services including products and services of our group entities and also to notify you about events, offers, sponsorships, marketing programmes and similar marketing campaigns. We may also process and analyze your Personal Information (including Sensitive Personal Information) to understand your usage trends and preferences, and to develop and market new products, services, features and functions to you based on the analysis conducted.

**vii) For conducting research to improve our product and services:** The Personal Information is used by us to research and gain insights into the latest market trends so that we can improve and develop technologies to support the products and services provided to you.

**viii) Compliance with legal and regulatory requirements:** The Personal data is processed to fulfill legal and regulatory obligations imposed on us, including but not limited to anti-money laundering (AML) and know your customer (KYC) requirements. This may involve sharing information with regulatory authorities or conducting necessary reporting.

#### **4. SHARING OF PERSONAL INFORMATION**

We believe that your personal information should be treated with utmost confidence, and we take all reasonable measures to ensure that your personal information is disclosed and shared with third parties through secure methods. You explicitly provide your consent to sharing your Personal Information (including Sensitive Personal Information) with third parties, its affiliates, and organizations in connection with services and products provided to you. We may share your personal information with following parties:

- i) Credit Bureaus:** We share your Personal Information with credit bureaus to obtain credit reports and assess your creditworthiness. This sharing is typically done to verify credit history, outstanding debts, payment behavior, and credit scores.
- ii) Verification Agencies:** Personal data may be shared with third-party verification agencies or service providers to validate the accuracy and authenticity of the information provided in the loan application by you. This may include verifying employment details, income, identity, or other relevant data.
- iii) Merchants:** We may share personal information with our service providers and vendors in accordance with our service agreements with them to ensure the confidentiality, security, and lawful processing of your Personal Information. The data is shared either directly or through a payment aggregator or a referral partner.
- iv) Internal Sharing within the Organization:** Your personal data will be shared internally within the company or with our Lender on a need-to-know basis. This may involve sharing information with loan officers, underwriters, risk management teams, and other relevant personnel involved in the loan application and decision-making process.
- v) Regulatory and Legal Compliance:** Personal Information may be shared with regulatory authorities, government agencies, or law enforcement entities as required by applicable laws and regulations. This sharing is typically done to ensure compliance with legal and regulatory obligations, including with CKYC (Central KYC Registry).
- vi) Lending Partners or Investors:** We may also share your Personal Information with our lending partners or investors who participate in funding the loans. This sharing is typically done to facilitate loan disbursement and manage the loan portfolio.

**vii) Data Transfer International:** We seek your explicit consent in case your Personal Information may be processed either locally or any other country where our approved third-party service providers operate, worldwide, as permitted by applicable laws. However, the data which is in relation to the services and products provided to you will only be stored in India. In such a situation, we will comply with the provisions of all the applicable laws and will also ensure that Vivamoney's entities or our third-party processors shall also comply with the same level of data protection as are applicable in India under applicable laws.

## **5. MARKETING**

Vivamoney may send you marketing communications through messages, emails, WhatsApp or any other digital mode, in relation to the products and services provided by us on Websites and Apps, any third-party platforms, or other platforms including social media platforms, if you have provided us your Personal Information or Sensitive Personal Information. The provision of such marketing activities shall be in accordance with applicable laws. You are entitled to withdraw your consent from receiving such marketing communication by either clicking on opt-out link (if available) or un-subscribe by clicking the link provided (if available) or by writing to us at [chat@vivamoney.in](mailto:chat@vivamoney.in).

## **6. DATA RETENTION**

Vivamoney will only retain minimal Personal Information and Sensitive Personal Information for operational purposes. Our Partner Lenders would store Personal Information and Sensitive Personal Information till such time as is required to fulfil the purposes for such information was collected, including you continue to have a loan or credit facility. The retention of Personal Information and Sensitive Personal Information by Vivamoney and Partner Lenders is determined by considering compliance with legal (contractual, statutory, or regulatory requirements), accounting and compliance reporting requirements.

Subject to the rights provided to you, the storage and purpose limitation restrictions provided within this Privacy Statement, and applicable laws, Vivamoney shall retain your Personal Information and Sensitive Personal Information for a maximum period of 5 years.

## **7. PROCEDURE FOR REMOVING USER NAME FROM THE RECORDS**

- i)** If and when you desire of having your Personal Information (a) removed from the records or not be used; (b) not be shared with a third party; Vivamoney will immediately upon receiving the written request to that effect shall, subject to the terms hereof and/or applicable law, remove and/delete all such information.
- ii)** If you no longer wish to receive notifications about the Services, you may change notification preferences by contacting us at [chat@vivamoney.in](mailto:chat@vivamoney.in). Notwithstanding the foregoing, Vivamoney may retain information if allowed under applicable law, even after receiving the written request to remove/delete all such information.

## **8. CHANGES TO PRIVACY POLICY**

Vivamoney reserves the right to change or update this Privacy Policy at any time. Your access and use of the App/Website following any such change constitutes your agreement to follow and be bound by these Privacy Policy, as updated or modified. For this reason, we encourage you to review this Privacy Policy each time you access and use the App.

## **9. DISPUTE RESOLUTION**

In the event of any dispute arising out of this Privacy Policy, it shall be settled in accordance with the laws of India and the Courts of Bengaluru, India shall have exclusive jurisdiction.

## **10. HOW TO CONTACT US**

This Website and the App is controlled by Vivamoney Solutions Private Limited having its registered office at Gurgaon, India and its corporate office at BHIVE Workspace, No.467/468, Shri Krishna Temple Rd, Indiranagar 1st Stage, Bengaluru, Karnataka. We are happy to address any of your queries, concerns or questions relating to processing (including storing, using and deletion) of your information which you can raise by writing to us at [chat@vivamoney.in](mailto:chat@vivamoney.in).

For any complaint or issues, you may address them to our Nodal Grievance Redressal Officer at:

**Mr. Tanmay Dwivedi**

Grievance Officer

Vivamoney Solutions Private Limited

BHIVE Workspace, No.467/468, Shri Krishna Temple Rd, Indiranagar 1st Stage, Bengaluru,  
Karnataka

[gro@vivamoney.in](mailto:gro@vivamoney.in)