

## **PRIVACY POLICY**

This Privacy Policy outlines Bajaj Finance Limited's approach to processing of Data.

At Bajaj Finance Limited, we understand the significance of your personal data and process the same in a responsible manner. We urge you to go through this Privacy Policy attentively.

### **Who is covered by the Privacy Policy?**

This policy is applicable to all the existing customers, prospect customers and persons ("**User**") who visit the office/branch and/or any '*Digital Property*' belonging to Bajaj Finance Limited ("**BFL**") and its subsidiaries namely, Bajaj Housing Finance Limited ("**BHFL**") and Bajaj Financial Securities Limited ("**BFSL**"), which offer financial services such as Secured & Unsecured loans, Deposits, Wallet product, third party Wealth Management products such as Insurance & Mutual funds, Stock broking service etc. ("**Financial Services**").

The reference made to (i) '**BFL**' in this Policy would mean and include to both BHFL and BFSL; (ii) the term '**Group**' would mean and include Group companies, namely Bajaj Allianz General Insurance Ltd., Bajaj Allianz Life Insurance Ltd., Bajaj Finserv Direct Limited, Bajaj Finserv Asset Management Company Ltd., Bajaj Finserv Health Ltd. and (ii) the term Digital Property would mean and include website, mobile application and/or any other electronic application.

This Privacy Policy explains about the type of information of the User that BFL collects, consent, its purpose, salient features etc. as detailed below. We encourage User to read this Privacy Policy regarding the collection, use, and disclosure of information by User from time to time to keep itself updated with the changes & updated that we make to this Policy.

### **Consent:**

By using our website/application/any other electronic application and by availing various products/services from BFL and Group, User consents to:

1. The terms of this Privacy policy ("**Privacy Policy**") in addition to the terms of use of mobile application, website, and product documents.
2. Collection of data in connection with availing loan and/or placing Fixed Deposit (FD) and/or third-party products such as mutual funds, insurance etc., facilitated by BFL.
3. Consent for collection of data in connection with Aadhaar based authentication (Aadhar eKYC) or verification (Aadhar OKYC) facility provided by Unique Identification Authority of India "UIDAI, to check/verify/download/obtain/upload/update KYC details from/with the Central KYC Registry (CERSAI), collection of data from Digilocker provided by MeIT (Ministry of Electronics and Information Technology).
4. Communications relating to marketing & business promotions.
5. Storage of data as per company's policy in addition to regulatory and legal requirements.
6. Consent for E Mandate Registration with eSignature.

### **Types of information:**

This policy is applicable to any types of '**information**' that is collected by BFL:

- a) which is in the nature of personal data of /demographic information of the User provided to BFL online or offline (i.e. Name, age, date of birth, gender, address, mobile number, email id, PAN number, photograph/image, KYC documents provided by customer or collected from CKYC registry/Aadhar Authority/Digi locker, bank account details, credit scores, GST details, provident fund account details, provided to BFL through mobile application, website and/or at the time of availing various financial products/services).
- b) which may or may not be personally identifiable and/or traffic information; and

For brevity's sake, the above type of information is collectively referred as **"Information"** in this Policy.

#### **Sources of Information:**

Following are the sources of **'information'** collected by BFL:

- a) from the User, during the product application journey, either online or offline.
- b) from User's browser, mobile application, or mobile device, including cookies etc.,
- c) from its Service providers, dealers, agents/agencies, including the server from the User's browser, mobile app, or mobile device.
- d) consent of User by reading the SMS and email information with the consent of User as part of rendering Financial Services.

#### **Purpose:**

Information collected from User may be used by BFL for the following listed **"Purposes"**:

- a) to provide the User with the services incidental and/or ancillary to the business of BFL.
- b) to promote the products/services of BFL.
- c) for evaluation of the existing BFL products/services, and/or develop products/services.
- d) to render service to User and/or to enhance / improve the Products/Services.
- e) to comply with Applicable Laws / regulations, including credit reporting.
- f) to the extent permitted by the terms of an agreement/ Applicable Law / regulations, share or process User's information in connection with the products / services provided by BFL, with its Group Companies and/or any third party.

#### **Cookies:**

Cookies are small data files that a website stores on your computer/electronic device. While cookies have unique identification nos., personal information (name, a/c no, contact nos. etc.)

SHALL NOT be stored on the cookies. BFL may:

- i) use persistent cookies which are permanently placed on User's computer to store non-personal (Browser, ISP, OS, Clickstream information etc.) and profiling information (age, gender, income etc.).
- ii) use Information stored in the cookies to improve User experience by throwing up relevant content where possible.
- iii) use the cookies to store User preferences to ease User's navigation on the website/electronic/mobile application.

#### **Salient Features:**

- a) BFL respects the privacy of User in accordance with prevailing Law/regulation that governs privacy and always strives to uphold the standards in protecting the same.
- b) Excepting with its Group, its subsidiaries, Service providers, the Information shall not be shared with any external organization unless the same is necessary to enable BFL to provide you services, meet legal and/or regulatory compliance requirement and/or to enable the completion of a transaction, rendition of services, pursuant to applicable norms/process or pursuant to the terms and conditions applicable to such Information as agreed with BFL.
- c) BFL may use the Information to enhance the User's experience and may make subsequent offersto the User about its products/services.

## **Data Governance and trainings:**

At our company, we believe in maintaining transparency with our customers when it comes to data governance policies. As per our data privacy policy, data governance is one of our prime focus areas that help us deliver quality services to our customers. We follow stringent guidelines on data governance, which include factors such as data quality, data minimization, data accuracy, and data accessibility.

We understand that data privacy is a critical concern for our customers, and we ensure that we use the data provided only for specific purposes, adhering to the customer's consent given. Our employees handle customer data ethically and securely. Our employees follow various parameters like data classification, ethical handling of customer data, minimizing data exposure to third parties, and maintaining the confidentiality and privacy of data, among others.

Our data governance policies help us maintain transparency and accountability when handling customer data, and we strive to continuously update and improve our policies to ensure the safety and privacy of your data.

## **Security**

Securing User's Information is of paramount importance to BFL, and it undertakes the following initiatives to secure privacy of the User's Information:

1. BFL implements various reasonable management, technical, and administrative measures to safeguard internal information, with sound technical controls to secure the underlying systems.
2. Alongside conducting periodic internal and external audits of systems, BFL adheres to multiple regulatory and statutory obligations. We also comply with Information Security certifications such as ISO27001:2013 (Information Security Mgmt. Systems), ISO22301 (BCMS), and PCIDSS.
3. BFL has in place controls such as data discovery which ensures that personal data of User is tracked across all its assets and security of such data is ensured using data encryption and masking methodologies. Further, we have implemented access controls across all our data assets to ensure that employees have access to limited data and only on a need-to-know basis.
4. BFL has implemented information security tools such as DLP and SOC solutions which help prevent the leakage of data outside its environment and monitor network across servers to ensure threats to User's data are mitigated.
5. BFL has a robust IT infrastructure support mechanism that ensures all systems are updated to the latest system and security patches.

In all contractual arrangements, BFL ensures compliance with appropriate standards from third-party agencies/service providers, with obligations to protect any information and apply appropriate measures regarding its use and transfer. Any acts involving unauthorized usage and sharing of information, breach of security procedures, usage of information for unlawful gain, or breach of confidentiality BFL warrants penalty as per master agreement which may or may not lead to legal proceedings.

Our responsibility is to keep you informed of our approach to information security and encourage your commitment to its successful implementation.

## **Service Providers**

We may employ third-party service providers and individuals due to the following reasons (not exhaustive):

- To facilitate BFL's products/ services.
- To provide the service on behalf of BFL.
- To perform any ancillary service related to products/services of BFL and/or its Group.
- To assist BFL in analyzing how the services are used; and
- To assist BFL and/or its Group in evaluating and improvising the service standards.

User is hereby informed that the third-party service provider/agent/agencies will have access to your information on a need-to-know basis to assist BFL in rendering service and are restricted from using the same for any other reason rather than specified during data collection. The third-party service provider is obligated not to disclose or use the information for any other purpose.

### **Responsibility of User:**

User acknowledges the following:

- a) BFL and/or its employees /assigns will not contact the User directly for disclosure of any personal information unless required for the above-mentioned Purposes. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting before disclosing any personal data/ information by reaching out to the BFL's official customer care number accessible on its website before making any disclosure.
- b) BFL will not be liable / responsible for any breach of privacy owing to User's negligence.
- c) User shall only use the official website/links of BFL for availing product/services by inputting the domain information on the address bar.
- d) User is completely aware about the potential risk of data/privacy breach and User shall be solely liable for any unauthorized disclosure/ breach of personal information etc. and any direct/ indirect loss suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal data (including but not limited to any Passwords, financial information, account details, etc.) are not shared/stored/made accessible through any physical means with or without User's knowledge (disclosure to any person/third-party etc.) or through any electronic means, by exercising the following precautions/ safety measures:
  - (1) User shall always check if "https" appears in any website's address bar before making any online transaction, to ensure that the webpage is encrypted.
  - (2) User shall avoid using third- party extensions, plug-ins or add-ons on the/your web browser, as it may result in the risk of tracking or stealing of User's personal details.
  - (3) User shall always type the information and not use the auto-fill option on web-browser and mobile apps to prevent the risk of storage of my personal information.
  - (4) User shall NOT access darknet, unauthorized/ suspicious/ malicious website, suspicious online platforms, downloading information from unreliable sources.
  - (5) User shall ensure to disable cookies before accessing any domain/website, to ensure that User's personal information is not tracked by any third-party, unless otherwise consciously permitted by User by accepting the same, for which, User alone will be responsible for the consequences thereof.
  - (6) User shall not respond to any generic emails from an unknown/ unidentified source.
  - (7) User shall check the Privacy Policy of website/ application to know the type of information that may be collected from User and the manner in which it may be processed by the website/ application before accepting/ proceeding/ transaction on any website/ application.
  - (8) User shall always verify and install authentic web/mobile applications from reliable source on User's computer / laptop / tablet / I-Pad / smart phone or any other electronic device.

User shall NOT access any unidentified weblinks, or any other electronic links shared over electronic platform (such as email, SMS, social media, websites).

**Data Storage, Retention and Handling:**

BFL shall retain/store User's Information in India if it is required to provide services or as long as it is required for business purpose. Retention of Information will be as per applicable law/regulatory requirements in India. BFL may retain the following kinds of information (not exhaustive):

| Sr. No. | Kinds of Information                                                                                                                                                                                                               | Retention Period                                                                              |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| 1       | KYC Documents (Identity and Address proof, and Account Opening Form)                                                                                                                                                               | During the tenure of relationship and At least Five years after cessation of the relationship |
| 2       | Loan Files containing documents like Application Form, Income Documents, agreements etc., collected at the time of opening account and thereafter in respect of Closed Account                                                     | During the tenure of relationship and 5 years from closure of Loan                            |
| 3       | Loan Files containing documents like Application Form, Income Documents, agreements etc., collected at the time of opening account and thereafter in respect of Closed Account (for B2B Loans availed through our dealer/partners) | During the tenure of relationship and 3 Years from closure of the Loan                        |
| 4       | Customer Walk-in Complaint/ Suggestion Register                                                                                                                                                                                    | 5 years                                                                                       |
| 5       | All necessary records of transactions between the BFL and the User, both domestic and international.                                                                                                                               | 5 Years from the date of transaction                                                          |
| 6       | Deceased Constituents A/c. (Death Certificates, Affidavits, Letters of Disclaimer, Succession Certificate copies, and other related correspondence)                                                                                | 8 years                                                                                       |

Information may be retained for an extended period (i) in case of requirement of any investigations under law or as part of any requirement before Courts/Tribunals/Forums/Commissions etc. and (ii) to enhance / improvise the products / services of BFL.

BFL ensures that access to User data is sufficiently restricted using access controls and industry standard encryption algorithms. Further, BFL has in place a robust incident management system along with a proactive incident response posture.

**Website & links to Other Sites**

BFL's website/ electronic/mobile application may contain links to other sites. If User clicks on a third-party link, User may be directed to that site. It may be noted that such external sites are not operated by BFL and is beyond the control of BFL. Therefore, BFL strongly advises the Users to review the privacy terms/policy of such external websites/electronic applications. BFL has no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

**Amendment of Privacy Policy**

BFL may amend/update the Privacy Policy from time to time as required under law. Thus, User is advised to review this page periodically for any changes, since any such changes will be effective immediately after they are updated/posted on this page.

**Contact us:** In case if you may want to share your concern, we welcome you to easily reach out to us through multiple contact options displayed on <https://www.bajajfinserv.in/reach-us>.