

Privacy Policy

1. Introduction

Resilient Digi Services Private Limited (“we”, “us”, “our” or “RDSPL”) values your privacy and is committed to safeguarding personal information relating to you (“you” or “your”). Personal Data refers to information about you that can identify you, such as your name, email address, or phone number (“**Personal Data**”). It describes how we handle your Personal Data when you interact with us through our BharatPe Money Website (“**Website**”), BharatPe for Business mobile application (“**Application**”) third party platforms, surveys, or other means (collectively referred to as “**Platform**”), in your capacity as a user or customer, prospective customer, business partner, supplier, job applicant, website visitor, or any other person in a business relationship with us.

This Privacy Policy should be read along with our Terms and Conditions, any separate product or service agreements, and any privacy notices provided when your Personal Data is collected. By using the Platform and/ or by providing your Personal Data for any Lending Product(s) or services of Lending Partner(s) (*defined below*) offered or facilitated by RDSPL, you consent to the collection and use of the information you disclose on the Platform in accordance with this Privacy Policy, including but not limited to your consent for collecting, using, sharing, and disclosing your information as per this Privacy Policy. By providing your Personal Data and using our Application, Website, products and services, you agree to the terms outlined in this Privacy Policy. If there is a conflict between this Privacy Policy and a specific privacy notice, the terms of the specific privacy notice will prevail.

If you provide Personal Data or other information about someone other than yourself, or on behalf of an entity, organization, or body corporate, you confirm that you have the legal right, including consent where necessary, to provide the information for the specified purpose.

This Privacy Policy does not apply to our affiliates or partners, each of whom may have their own privacy policies. In situations where you interact with such partners, we strongly encourage you to review the applicable privacy policy for that particular site, service, or interaction.

2. Where we collect your Personal Data from?

We may collect your Personal Data from several sources, including:

(i) **Personal Data you provide directly:**

This includes any Personal Data you share with us through our Platforms or other means, such as when you create service requests through a web form on our Platforms or social media channel, or directly communicate with our customer support.

(ii) **Personal Data we collect automatically:**

When you use our Platform or services, we use automated means such as cookies and similar technologies to automatically collect certain data about you, including your Personal Data, usage patterns, device information, and other technical details that help us improve your experience.

(iii) **Personal Data we receive from third parties:**

We may also receive data, including Personal Data, about you from external sources, such as our Lending Partner, business partners, or third-party websites (like analytics services and social media channels like WhatsApp). If you connect to our Platforms through third-party services, we may gather additional data to verify your identity or enhance our services.

3. What Personal Data we process and why?

We collect, store and use two basic types of information from you in conjunction with your consent or use of the lending products and services facilitated through our Platform (“**Lending Product(s)**”) in partnership with RBI registered non-banking financial institution and/or banks (“**Lending Partner(s)**”) i.e. Personal Data, financial information (PAN, credit history, UPI ID, bank account details) and business information (business address, business place proof, GST No.,UDYAM registration no., authorised signatory details, amongst others) and technical information. By using our Platform or our products and services, you consent to us processing your Personal Data, directly from you or through other methods, including but not limited to:

S.No.	User Activity and Personal Data Collected
i	<p>Personal Data provided by you for using Platform and availing Lending Product(s)</p> <p>We process the following Personal Data when you avail any Lending Products:</p> <ul style="list-style-type: none"> (a) <u>Contact Information</u>: We may collect contact information necessary to manage our relationship with you, communicate with you about our Lending Products, to verify your identity, to provide references for availing the Lending Products, to contact your references for verification and to reach out to you and to undertake fraud checks. (b) <u>SMS information</u>: Collect SMS information to facilitate our Lending Partners to perform a credit risk assessment. For example: we will send an automated message from your device to link and verify your phone number to authenticate and authorise your transaction. (c) <u>Camera, microphone or device location</u>: Upon your consent, we access to the camera, microphone and location of your devices for the purpose of completing your onboarding process and submitting relevant documents for facilitating KYC verification for Lending Product(s). (d) <u>Others</u>: As may be explicitly required & and consented by you from time to time for availing Lending Products or using our Platforms and services, we may collect additional Personal Data categories such as payment details, balances and transaction history on the Platform, contact references, investment information, etc. Before providing any reference(s) at the time of applying for and/or availing of any Lending Products, you undertake to take explicit consent from such reference(s). You shall also inform such person that Company or any entity/persons authorized by it, may contact them for conducting your background verification, reach out to you (if you’re not available) and/or to undertake fraud checks to facilitate Lending Products from its Lending Partner and provide necessary services related to it. If you choose to provide any reference(s) for any of the Lending Products, the Company or the Platform shall deem that you have obtained consent from such person (whose reference is given) after disclosing the purpose for which their reference is provided. Please note that the Company or its Lending Partner or its authorized entity/person and/or the Platform shall be under no duty or obligation to ensure the authenticity or

	<p>accuracy, or validity of the consent obtained by you from reference(s) or the non-availability of the consent from the references. You agree to indemnify and/or defend the Company, its Lending Partner and/or its authorized entity/person, against any loss, damages, civil or criminal proceedings and/or any liability which may arise and/or be caused due to breach of this obligation.</p>
<p>ii</p>	<p>Technical Information provided by you for using the Platform and its services</p> <p>When you visit our website or other Platform, we automatically collect certain technical and behavioral data. We place cookies and other similar tracking technologies on your browser or device that help us to manage our Platform (including ensuring data security, improving the design and performance of our websites and better understanding the visitor’s behavior).</p> <p>The data collected by these cookies and similar technologies includes:</p> <ul style="list-style-type: none"> (a) <u>Device information</u>: We collect device information, including browser type, device type, unique device identifiers, operating systems type and version, software characteristics, URLs, usage statistics, IP address, language preference, referring site, and network information. (b) <u>Usage information</u>: We collect data about how you use of our Platform. This includes the date and time stamps of your visit to the Platform, the content and web pages viewed, time spent on each web page, click data, referrer, and other usage details. (c) <u>Non-Personal Data</u>: When you access the Platform, we may collect certain information from you that is non-personal in nature (for example – the type of browser you are using, your internet protocol address, your preferences on the Platform etc.). This information is used for purposes such as serving and rendering ads, personalizing ads, analysing our Platform flow, and improve your experience of the Platform. <p>Note: For devices that support authentication through biometrics, the Company will provide a feature to unlock the platform/application using Face ID or fingerprint recognition. We do not retrieve or store such biometric information, including Face ID and fingerprint permissions, from your mobile device.</p>
<p>ii</p>	<p>Personal Data provided by you for contacting us or availing customer support services</p> <p>When you contact us, either as our client or prospective client, we process certain Personal Data in each case to manage the business relationship, address your request and comply with the applicable law.</p> <ul style="list-style-type: none"> (a) <u>Sending us a business enquiry</u>: If you send a business enquiry via our dedicated web form or contact our customer support representatives, whether you're a prospective or current dealer, business customer, exporter, partner, or media/PR representative, we process your certain Personal Data. This includes, among other things, full name, business email, business address, business phone number, location data (city, state

	<p>and country), data regarding the category of products and services in relation to which business query is sent, and data or records you provide during interactions with our representatives.</p> <p>(b) <u>Contacting customer support or creating service request</u>: You may contact RDSPL’s customer support team through our dedicated phone, or third-party channels like WhatsApp, provided on our Platform, to submit a service request, or raise a query or complaint. Pursuant to the same, we process your Personal Data as required to assist you properly which includes, among other things, full name email address, phone number, city and state, other details necessary for addressing your service request or inquiry, information related to the products or services for which you seek support; records of our communications (including call recordings in accordance with the applicable law).</p>
<p>iii</p>	<p>Personal Data provided by you while engaging with our Marketing Communications and Advertisements or other third-party Platforms</p> <p>Each time you engage with our marketing campaigns and promotions on our or third-party Platform(s) or any social media platforms (e.g., sharing comments on posts of our official pages on different social media platforms) to stay updated about our products and services, we process Personal Data to provide you with promotional emails or, for clients, to share commercial opportunities that are relevant and interesting to you. Such processing is subject to this Privacy Policy unless otherwise stated.</p> <p>With your consent, we process the following data when you subscribe to receive promotional communications via our dedicated forms published on our Platform or social media pages, advertisements on third-party websites, interactions with our customer support team: full name, email address, telephone number, company (if applicable), location data (city, state, or country), information about your interactions with our website, and information whether you open, read, or click on our promotional emails.</p> <p>We may also gather Personal Data from public and third-party sources, such as third-party analytics service providers, on the internet about your online activities, including information publicly available, and contact details from third-party commercial sources, like social media sites or Google services. This collection of Personal Data is in addition to any information you submit to us directly or we collect by automated means.</p>

When you use our Platform, we collect and store information which is provided by you from time to time after seeking your explicit consent permissions from you to get the required information. Our primary goal in doing so is to provide you a safe, efficient, smooth, and customised experience and services. This allows us to provide services and features that meet your needs, and to customise our Platform to make your experience safer and easier and to improve the services provided by us. More importantly, we only collect personal information from you that we consider necessary for achieving the aforementioned purpose. To the extent possible, we provide you the option of not divulging any specific information that you wish for us not to collect, store or use. The Platform shall clearly display the Personal Data it is collecting from you, and you have the option to not provide such Personal Data. However, this will limit the services provided to you on the Platform. You may also choose not to use a particular Lending Product or its feature on the Platform and to opt out of any non-essential

communications from the Company and/or its affiliates, holding company. Depending on the Lending Product you may want to avail/have availed, some of the information we ask you to provide is identified as mandatory and some is identified as voluntary. If you do not provide the mandatory information for a particular Lending Product or any of its features that is required, you will not be permitted to avail said Lending Product or feature (or will have only the limited Lending Product or feature).

4. How we use your Personal Data?

We process your Personal Data collected through your use of our Platform for various purposes, including providing, improving, and securing our services, as well as communicating with you. Here's a breakdown of the purposes for which we use your data:

S.No.	Purpose	How we use it?
1.	Enabling access to our Platform and offering Lending Product(s) and services	We use your Personal Data to provide and maintain our Platform, products, and services by: <ul style="list-style-type: none"> a) verifying your identity and managing your relationship with us; b) administering our Platform and performing internal operations, such as troubleshooting, data analysis, testing, and monitoring usage trends; c) customizing your experience by remembering your preferences like language and region; d) displaying personalized content and allowing you to communicate business inquiries, complaints, or service requests; e) facilitating access to Lending Products and related services such as KYC verification, loan document signing, etc.
2.	Communicating with, responding to, or providing support in relation to your inquiry, question, or service request	We may use your Personal Data, including information from third parties, to: <ul style="list-style-type: none"> a) contact you via email, SMS, phone, or social media (e.g., WhatsApp) regarding your interest in our products, services, or inquiries; b) verify your identity when communicating with you; c) Provide updates about your requests or inquiries, administrative messages, and notifications about service changes or new features; d) respond to your business enquiries and service requests; e) assist with our customer support services to investigate and resolve your queries, monitor and improve our customer support responses; f) fulfil requests for content, services, and features.
3.	Developing and implementing our marketing and business development activities	With your consent, we may use your Personal Data to: <ul style="list-style-type: none"> a) provide you with information about other products and services we feel may interest you or be best for you; b) administer marketing communications, surveys, and promotional offers (surveys and cashback offers); c) analyse the effectiveness of our advertising and deliver relevant ads; d) recommend products or services that match your interests; e) develop targeted ads and create marketing campaigns tailored to your preferences; f) gathering feedback and improving our services; g) display our ads on third-party websites and apps that you may use.
4.	Preventing	We use your data to protect our Website and users from fraud and security

	frauds and security breaches	threats. This includes: a) preventing, detecting, and investigating criminal activity, misuse, or network damage; b) securing the Website from unauthorized access, malware, viruses, and other IT security threats; c) verifying identities and ensuring the safety of our Platform and users, and the integrity of our Platform, client and prospective clients; d) ensuring proper functioning, troubleshooting and network security to protect your Personal Data from potential harm or misuse.
5.	Improving our Platform and services	We use your Personal Data to enhance our Platform and services by: a) collecting statistics on Platform usage, personalising your experience and interactions with us, and expanding our services; b) analysing trends, track usage, and developing new features. This may include using Artificial Intelligence in line with our policies; c) aggregating Personal Data on an anonymous basis with other data for data analytical and reporting purposes;
6.	Complying with applicable laws and regulations	We may use your Personal Data to comply with legal obligations, including: a) responding to requests or orders from courts, tribunals, regulatory bodies, government agencies, or supervisory authorities; b) investigating and resolving to address claims or disputes related to our services; c) establishing, exercising, or defending legal claims in court or before regulatory authorities in situations where it is necessary to establish, exercise, or defend legal claims, we may process your Personal data in legal proceedings, whether in court or before regulatory bodies; d) managing risks, seeking legal advice, and protecting our business and the Website.

5. Who we share your data with?

We may share your Personal Data with third parties upon your consent or where required under applicable statutory or regulatory obligations. Such sharing is undertaken strictly on a need-to-know basis, both internally within our organization and with authorized third parties including our Lending Partners for providing the Lending Products (for activities such as risk and credit underwriting, evaluation, due diligence checks, facilitating document collection and/or verification for KYC purposes, record keeping purposes, fraud checks, to undertake research and analytics for improving the Platform operations and services, customer service and grievance redressal, for collection services etc.). Where feasible, you shall have the option to restrict disclosure to third parties. However, where sharing of information to a particular third party is necessary for providing the Lending Products, you shall not be able to avail such Lending Products in case you decide to restrict such disclosure. Here's a breakdown of [third parties](#) with whom we may share your data:

S.No.	Who we share the data with:	Why we share the data:
1.	RDSPL's affiliate	We may share your information to our subsidiaries, affiliates, and

	companies	group companies in order to efficiently provide certain Lending Products or particular features, for internal corporate/business restructuring purposes and audit related purposes etc. in compliance with applicable laws.
2.	Banking partners, payment processing partners, co-branding partners, lending partner	We may share your information to financial institutions and service providers such as payment processors, card issuers, NBFC partners and banking partners to facilitate transactions/for providing such Lending Product.
3.	Service providers	We work with third-party service providers to deliver our services, including contractors, consultants, IT service providers, data storage providers, marketing and advertising services, and customer support. These providers process your Personal Data only on our behalf and are contractually bound not to use it for any other purposes except as instructed by us or required by applicable law.
4.	Identity and other information verification providers	We may share your information to identity and other information verification processes in accordance with applicable laws.
5.	Legal and regulatory purposes	We may disclose your data with third parties (such as governmental authorities, law enforcement agencies, etc.) when the Company must comply with its legal obligations
6.	Marketing, business development, and sales partners	We may share your information with marketing, business development and sales partners for the purpose of improving and carrying out marketing or business development activities to provide better services to you through our Platform
7.	Corporate Transactions / Change in Control / Business Transfer	If we are involved in a merger, acquisition, restructuring, or sale of assets, your Personal Data may be transferred as part of that transaction. Any recipient of your data will be obligated to protect it according to this Privacy Policy.
8.	With your consent	If you give explicit consent or make a specific request, we may share your data with other parties for purposes not covered in this Privacy Policy.

The third parties to whom your information may be shared for providing/enabling the Lending Products are available on BharatPe Money Website at the link provide [herein](#).

6. How long we keep your Personal Data?

We will keep your information as long as you are a borrower and/or in the event where you have availed any of the Lending Product through the Platform. We may keep your information after you stop being a borrower/customer of a Lending Product, for the following purposes:

- (a) To respond to a question or complaint;
- (b) To establish, exercise or defend our legal claims;
- (c) To comply with applicable legal and regulatory requirements relating to data retention, in which case we may retain your personal information for a minimum period of five (5) years from the date of deletion or termination of your 'BharatPe for Business' Application account, or for such longer period as may be required under applicable law;

- (d) The deletion of the information we collect from you will happen within a reasonable period of time after expiry of the retention period in accordance with applicable laws or for a minimum period of five (5) years from the date of deletion or termination of your ‘BharatPe for Business’ Application account. All data collected (which is electronic form) will be destroyed in a responsible manner in accordance with applicable laws.

We may also retain anonymized data, aggregated with other anonymized information, for analytics, research, or other business purposes. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities on the Platform, we may collect and store such information for providing services and for record keeping purposes.

7. Your rights

We are committed to protecting your Personal Data and ensuring your rights in relation to processing of your Personal Data are respected in accordance with applicable data protection laws. Here we want to make you aware of those rights:

Your rights	Details
Right to access information about your Personal Data	You have the right to request access to your Personal Data that we possess about you (for instance, a summary of your Personal Data, and a list of identities of all the third parties with whom we share Personal Data).
Right to seek correction and erasure of Personal Data:	If you believe that the Personal Data we hold is inaccurate, incomplete or outdated, you can request that we correct or update such Personal Data at our end. You may also request deletion or erasure of your data processed by us; however, in certain cases, we may need to retain it for legal or regulatory reasons (<i>See Clause 6 (How long we store your data) above</i>). However, this will limit the services provided to you on the Platform.
Right to Grievance Redressal	If you have concerns about how we process your data or if you wish to file a grievance, you may contact our Grievance Redressal Officer at nodalofficer@bharatpemoney.com . If your grievance remains unresolved, please be informed that you have the right to escalate it to the competent supervisory authority or Data Protection Board under the Digital Personal Data Protection Act 2023.
Right to Nominate	You have the right to designate another individual to exercise your rights under this Privacy Policy on your behalf in the event of your death or incapacity.
Right to Withdraw Consent	You may withdraw your consent given for collecting any information and personally identifiable information that is stored with us, at any time by sending an email to nodalofficer@bharatpemoney.com . Once you have withdrawn consent to use your Personal Data processing by us, we will stop actively processing your Personal Data but may store it for archival/record keeping purposes in compliance with applicable laws. In such an event, we reserve the right to not allow you further usage of our Platform or provide/use any services thereunder, without any obligations or liability, whatsoever, whether in contract, tort, law, equity or otherwise, in this regard.

To exercise any of these rights or seek further information, please write to us at nodalofficer@bharatpemoney.com. We may require verification of your identity before we processing your request. We reserve the right to not to respond to complaints that are manifestly false, unfounded, or frivolous. Additionally, these rights may be limited in certain cases where we are legally required to process or retain your personal data.

8. How we protect your personal data?

We are committed to ensure the security of your Personal Data that we collect and store, and protect it against any unauthorised access, alteration, disclosure, or destruction. We adopt following measures to protect your Personal Data based on the type and sensitivity of the data:

Our servers are located within the territory of India, where your data is stored securely. The Platform has reasonable security measures as per the Information Technology Act, 2000 in place to protect the loss or misuse of the information under our control. We implement reasonable physical, administrative, and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt all sensitive personal information when we transmit such information over the internet. We also require that our registered third-party service providers protect such information from unauthorized access, use and disclosure.

Our Platform has stringent security measures in place to protect the loss, misuse, and alteration of information under control. We endeavour to safeguard and ensure the security of the information provided by you. We use Secure Sockets Layers (SSL) based encryption, for the transmission of the information, as per the applicable law. We blend security at multiple steps within our products with the state-of-the-art technology to ensure our systems maintain strong security measures and the overall data and privacy security design allow us to defend our systems ranging from low hanging issue up to sophisticated attacks.

Please note that we or our Lending Partners or any person authorized by us will not ask you to share any sensitive data or information such as account/login/passwords/financial information (bank details, OTPs etc) and other sensitive personal information via email/telephone/SMS/link. Please do not share such information to any person even if such persons claims to be the authorized representative of us and/or any of our partners. However, transacting over the internet has inherent risks which can only be avoided by you following security practices yourself, such as not revealing account/login/passwords/financial information such as bank details, OTPs and other sensitive personal information to any other person. In the event you suspect that your account/personal information has/may have been compromised or you receive any suspicious call, SMS, link, email requesting your sensitive personal information, you may reach out to our grievance officer and inform him of the same.

While we take all reasonable technical, physical safeguards, to preserve your information, we cannot warrant the security of your information you share with the Company and you do so at your own risk. We ensure security of our systems and apply all reasonable cyber security safeguards as required under applicable law and adopt best practices in accordance with cyber security standards. In the event of any data security breach, the Company will ensure to identify the cause of such data breach and without delay, in a reasonable and timely manner ensure to take all relevant steps to curtail the said data breach and comply with applicable laws and further apply stringent preventive measures to avoid the same

9. Third Parties and Links

The Platform may contain links to third party applications/websites that may collect personally identifiable information about you. In the event you access such third party applications/websites, please be aware that the privacy policy of such third party shall be applicable on the information collected from such applications/websites. Please refer to the privacy policies of such third parties before sharing any data with them.

10.Cookies and other tracking technologies

In case we use cookies and similar tracking technologies to enhance your experience on our Platform, improve our services, and better understand how you interact with our content. Cookies are small data files stored on your device via your web browser when you access our Platform. These files help us identify your preferences, track trends, and enable faster logins, among other purposes. They collect data such as your IP address, browser type, and device type (e.g., PC, smartphone), and help us identify you on your subsequent visits to our Website and tailor our offerings and services to your interests.

11. How to contact us?

You may contact us on any aspect of this Privacy Policy or for any discrepancies / grievances with respect to your Personal Data you provided to RDSPL, by contacting our Grievance Redressal Officer/Data Protection Officer as set out below:

Grievance Officer Contact Details:

Address: Building No. 8 Tower C, 12th Floor, DLF Cyber City, Gurgaon-122002 Haryana

Email: nodalofficer@bharatpemoney.com

[9:30 AM to 6:30 PM, Monday to Friday except Public Holidays]

12. Updates to this Privacy Policy

RDSPL may modify, add, or remove portions of this Privacy Policy, at its sole discretion. We will make reasonable efforts to notify you of any material changes via notifications, SMS or email. Once the revised Privacy Policy is published on the Website, the changes will take effect immediately unless stated otherwise. Your continued use of our Website after such update constitutes consent to the updated notice to the extent permitted by law. Please take the time to periodically review this Privacy Policy for the latest information on our privacy practices.

13.Updates to this Privacy Policy

This Privacy Policy will be governed by and construed in accordance with the laws of India and subjected to the exclusive jurisdiction of Courts of New Delhi.