

# **Client Data Security Policy**

Namdev Finvest Private Limited

### Registered Office:

S-1, S-7-8, SHREE NATH PLAZA, SECOND FLOOR,

NEER SAGAR MARKET, BHANKROTA,

JAIPUR, RAJASTHAN-302026

INDIA

CIN NO: U65921RJ1997PTC047090

# Har Pal Aap Ke Saath ..

**1** | Page 1



| Policy Name              | <b>Client Data Security Policy</b> |          |  |
|--------------------------|------------------------------------|----------|--|
| Version                  | 2.0                                |          |  |
| Effective date           | June 2024                          |          |  |
| Prepared and proposed by | Ms. Sakshi Sharma                  |          |  |
| Approver                 | Board of Directors                 | May 2025 |  |



| Page 2



# **INDEX**

| S. No | Particular  | Page No. |
|-------|---|----------|
| 1     | Introduction  | 4        |
| 2     | Definitions   | 4        |
| 3     | Applicability of the Policy   | 4        |
| 4     | Purpose of Collection and Use of Personal Information /<br>Sensitive Personal Data or Information | 4        |
| 5     | Disclosure of Personal Information  | 5        |
| 6     | Reasonable Security Practices and Procedures  | 5        |
| 7     | Notice of Change  | 5        |
| 8     | Cooki <mark>e Policy</mark>   | 5        |



**3** | P a g e 3

## 1. Introduction

**Namdev Finvest Private Limited (NFPL)** is a Non-Banking Financial Company having valid Certificate of Registration with Reserve Bank of India vide registration No. B-10.00260 on 20th August 1997 under current RBI classification as NBFC – Non-Deposit taking Asset Finance Company.

It is focused on offering finance to MSME, Two-wheelers, Solar panel loan, Electric Vehicle (EV) loan, EV charging station loan and all kind of light commercial vehicles segment.

### 2. Definitions

"Personal information" (PI) 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 the Company, is capable of identifying 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 & history;
- Biometric information;
- Any detail relating to the above clauses as provided to body corporate for providing service, for processing, stored or processed under lawful contract or otherwise.

Provided that, any information that is freely available or accessible in public domain or furnished under any law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this policy.

#### 3. Applicability of the Policy

This Policy is applicable to the personal information and sensitive personal data or information collected by the company or its affiliates directly from the customer or through the Company's online portals, mobile apps and electronic communications as also any information collected by the Company's server from the customer's browser.

#### 4. <u>Purpose of Collection and Use of Personal Information / Sensitive Personal Data or Information</u>

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 shall not divulge any personal information collected from the customer, for cross selling or any other purposes, without the written consent of the customer.



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. <u>Reasonable Security Practices and Procedures</u>

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. The Company maintains its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. The Company ensures that its employees and affiliates respect the confidentiality of any personal information held by the Company.

#### 7. Notice of Change

The Company may, from time to time, change this Policy.

#### 8. Cookie Policy

The Company's digital platforms may use various third party analytical tools. These tools may use cookies which are downloaded to the customer's device when the customer visits a website in order to provide a personalized browsing experience. Cookies are used for other purposes like remembering the customer's preferences & settings, provide personalized browsing experience and analyse site operations. These cookies collect information about how users use a website. All information collected by third party cookies is aggregated and anonymous. By using the Company's website, the user agrees that these types of cookies can be placed on his/her device. User is free to disable/delete these cookies by changing his/her device / browser settings. The Company is not responsible for cookies placed in the device of user/s by any other website and information collected thereto.