

WEBSITE AND MOBILE APPLICATION

We are committed to keep your data secure, your private information private, and being transparent about our practices. We adhere to the best practices to secure information collected from you.

Purpose of the Policy

IDFC FIRST Bank Limited, a company incorporated under the provision of Companies Act, 2013 and a Banking company within the meaning of Banking Regulation Act, 1949 having its registered office at KRM Tower, 7th Floor, No. 1, Harrington Road, Chetpet, Chennai - 600031, Tamil Nadu, India. owns, manages and operates this platform under brand name 'IDFC FIRST Bank Loans' (hereinafter referred as "the **Bank**", "**We**", "**Us**", "**Our**". By visiting our mobile and/or web application ("**App**") (collectively, the "**Platform**") and availing the services provided by us ("**Services**") you agree to be bound by the terms and conditions of this Privacy Policy

For the purpose of this Privacy Policy, the users of the Services may be customer/consumers, or any other persons using Services or accessing our Platform ("user" or "you" or "your").

When you use our application, we collect and store your information (personal information) which is provided by you from time to time by **explicitly seeking permissions from YOU to get the required information**. Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience and services. This allows us to provide services and features that meets your needs, and to customize our Platform to make your experience safer and easier and to improve the services provided by us. More importantly, we collect personal information from you that we consider necessary for achieving the aforementioned purpose.

We respect your privacy and are committed to protecting it through our compliance with this Privacy Policy. This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can delete your information.

If you do not agree to this Policy or any part thereof, please do not use or access our Platform or any part thereof

Information Collected by the Application

The Bank will collect personal information of the User. The Information shall not be shared with any external organization unless the same is necessary to enable IDFC FIRST BANK to provide services to the customer or to enable the compilation of a transaction, credit reporting, or the same is necessary or required pursuant to applicable banking norms or pursuant to the terms and conditions applicable to such Information as agreed to with IDFC FIRST BANK. Needless to add, confidentiality norms as applicable to banks shall be adhered to. IDFC FIRST BANK may also share Information to provide customer with superior services and a range of offers In general, you can browse the Website or App without

telling us who you are or revealing any personal information about yourself. However, additional information may be gathered during subsequent use of the App by the User, whenever you choose to provide it.

1. Certain mandatory information will be collected at the time of registration on the App which is required to enable you to login to the App and for us to:
 1. verify your identity using KYC documents.
 2. determine your eligibility for using its proprietary technology; and
 3. safeguard against illegal activities like fraud, cheating, misappropriation, etc.
2. In order to use the facilities and services available on the App, you may be required, from time to time, to provide certain additional personal information after registration on the App, which information shall be collected only upon receiving your express consent.
3. . The Bank may also automatically receive and collect certain anonymous information in standard usage logs through the web server, including mobile-identification information obtained from the equivalent of "cookies" sent to the App, including mobile network information, standard web log information, traffic to and from our App, tracking inside the App and any other available information, from:
 - a) an IP address, assigned to the device used by you; for instance your computer to the internet, etc. This information may include the URL that you just came from (whether this URL is on our Website or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, and your IP address.
 - b) the domain server through which you access the App and the functions and features therein; and
 - c) the type of device used by you.
 - d) Cookies are small data files that a Website stores on Your computer. We will use cookies on our Website similar to other lending websites / apps and online marketplace websites / apps. Use of this information helps Us identify You in order to make our Website more user friendly. Most browsers will permit You to decline cookies but if You choose to do this it might affect service on some parts of Our Website.
 - e) If you choose to make a purchase through the Website, we collect information about your buying behavior.
 - f) We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve our users and improve our services. This information is compiled and analyzed on an aggregated basis
 - g) We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.
 - h) If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Website, we collect such information into a file specific to you.

4. Your Financial Transactional SMS

We Collect and monitor only financial transaction SMS which includes name of transacting party, a description of the transaction and transaction amount.

- a) We don't collect your personal SMSs from inbox We only collect financial SMS sent by 6-digit alphanumeric senders from your inbox which helps us in identifying the various accounts that you are holding and the cash flow patterns that you have as a user to help us perform a credit risk assessment which enables us to determine your risk profile and to provide you with the appropriate credit analysis to enable you to take financial facilities from the regulated financial entities and other service providers available on the platform.
- b) The purpose of performing a credit risk assessment: This credit risk assessment enables faster and quicker loan disbursal. No personal SMS are accessed, read or collected.
- c) While using the app, it periodically sends the financial SMS information to our affiliate server and to us.

5. Your device information

The information the App collects, and how that information is used, depends on how you manage your privacy controls on your device. When you install the App, we store the information we collect with unique identifiers tied to the device you're using.

- a) We collect information about the device you use which helps us provide features like automatic updates and additional security so that your account is not used in other people's devices.
- b) In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behavior, thereby allowing us to improve our services and provide an enhanced customized user experience to you
- c) The information we collect includes your device's unique ID i.e. IMEI number, operating system version, SDK version and mobile network information including carrier name, SIM Serial and SIM Slot.
- d) We collect this information when you download and install the App and give the permission to read the device information.

6. You may choose to provide us with access to certain personal information stored by third party sites. We will have access to such information to the extent allowed by your privacy settings on that site and your specific authorization. In the event you associate your 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.

- a) We may disclose Your information, without prior notice, if We are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such

information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of Us, Our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

- b) We may share your information with other business entity we (or our assets) merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. Should such a transaction occur than any business entity (or the new combined entity) receiving any such information from Us shall be bound by this Policy with respect to your information.
- c) We will disclose the information to our third party technology and credit partners to perform credit checks and credit analysis like Credit Bureaus or third party data source providers;
- d) We will share Your information under a confidentiality agreement with the third parties for various verification process and restrict use of the said Information by third parties only for the purposes detailed herein. We warrant that there will be no unauthorized disclosure of your information shared with third parties.
- e) By using the Platform, you hereby grant your consent to the Company to share/disclose your Personal Information (i) For data verification purpose (ii) To the concerned third parties in connection with the Services; and (iii) With the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities, in accordance with applicable laws of India.

7. Information we collect from third-parties (EMAIL ACCOUNT DATA)

- a) Subject to your consent, we may request certain third parties to provide information about you which could help us to customize and personalize your experience of our Services.
- b) If you choose to link and connect your email account with our application, we may access the said account for purposes such as collecting your financial, institutional and transactional information to be able to organize your information in your account and provide deep analytics.
- c) We may seek your consent and request access to your email account. If permitted, the application shall automatically securely access the contents of emails on an ongoing basis for the purpose of providing an in-depth view of your net worth on a regular basis.
- d) The Application's access to the email account(s) is authorized through the email provider's access mechanism. You can choose to enable us to access one or more of your email accounts by explicitly consenting to each single account separately. Please note that your consent to any of the above is purely voluntary. You can de-link the access to your email any time you wish.
- e) We only read emails from financial and institutional service providers including, but not limited to, banks and credit card issuers and do not open, read or access any personal (non-institutional) emails. We hereby confirm that we do not access any other personal emails. This distinction is made based on the sender email address.

- f) Please note that such data obtained by this integration will be used by the Bank solely for providing the Services, updating the User's investment information on a monthly/ quarterly / annual basis, providing accurate analytics on the User's spent pattern and further improving the User experience pertaining to the features of the Platform. We shall not use or transfer any data or information received from the integration of the email addresses with the account on the Platform to third parties for any purpose other than as explicitly authorised by the User.
- g) The Services shall not use this Email data for serving advertisements.
- h) The Services shall not allow humans to read this data unless we have your affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for the App's internal operations and even then, only when the data have been aggregated and anonymized.
- i) Further, if you want to have your email consent and details removed from all our systems, please write to us at customer.care@idfcfirstbank.com. Please specify the subject of the mail as "Email consent and details removal request" and provide the following details provided during the loan application.
 - i. Email account against which access was provided.
 - ii. Name
 - iii. PAN details
 - iv. Mobile number
 - v. Mobile app name

8. **Contacts**

For example, IDFC FIRST BANK's loan process and guidelines mandates us to verify "references". This feature enables us to do that.

9. **Location**

For example, your location helps IDFC FIRST BANK to locate our nearest branches for you and make location-based service or visit recommendations as needed.

10. **Camera**

For example. Camera access is required so that you can easily scan or capture QR codes, cards, documents, etc. and save time by allowing us to auto-fill your required data.

KEEPING YOUR INFORMATION SECURE

We build security into our Services to protect your information. The App is built with strict security features that continuously protects your information.

Our App 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, which is currently the permitted level of encryption in India. When the information provided by you is not transmitted through this encryption, your system (if configured accordingly) will display an appropriate message ensuring the best level of secrecy for your information.

The Bank recognises the importance of protecting the privacy of all information provided by visitors of this Mobile application. the Bank uses all reasonable precautions to keep the personal information disclosed to us secure and to disclose such information only to responsible third parties after permission from the visitor or as required by law. the Bank is not responsible for the content or the privacy policies of mobile applications to which it may provide links. You shall bear all responsibility for keeping the password secure and the Bank shall not be responsible for the loss or misuse of the password. No refund/cancellation will be initiated against any of the services We work hard to protect from unauthorised access, alteration, disclosure or destruction of information we hold, including:

- a. We use encryption to keep your data private while in transit;
- b. We offer security feature like an OTP verification to help you protect your account;
- c. We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;

We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

The Bank shall use generally accepted industry standards to protect your information submitted to us, both during transmission and upon receipt. However, please be advised that, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, even though we strive to use commercially acceptable means to protect your Information, we cannot guarantee its absolute security.

II. Method and manner of use of User information

1. When you register with the App, we will use the information supplied by you to pull a credit report from a credit bureaus and identity verification services to facilitate us to evaluate your loan request in the context of your complete financial situation.
2. We use your information to deliver our Service like processing your SMSs and identifying your bank transactional messages to provide you with your bank accounts information on the App. This information includes bank name, bank account number, balance and credit and debit history for an account. It helps us perform a credit risk assessment for you to enable us to process your loan application faster.
3. The Bank will also use your information to enable activities and transactions that need to occur during the process of lending, such as:

1. Generating and maintaining your profiles on the App;
 2. Provide personalized features;
 3. Aiding us to provide better services;
 4. Facilitating collection activities as needed;
 5. Maintaining regular communications with you concerning transactions you initiate, such as requesting information or assistance, submitting a loan request, making payments, transferring funds, etc.
 6. Modifying the App from time to time to cater to your interests;
 7. Providing the App and the functions and features therein, efficiently;
 8. Preserve social history as governed by existing law or policy.
4. You acknowledge that you are licensing us to use, modify, display, distribute and create new material from the information you provide through the App to render certain services on the App. By providing such information, you automatically agree, or promise that the owner of such information has expressly agreed to allow or license, as the case may be, us to use the information in the manner set out in this Privacy Policy, without the payment of any fees. the Bank may, to the extent permitted by law, also use, license, reproduce, distribute and disclose aggregate, non-personally identifiable information that is derived through your use of the App and you hereby provide consent for the same.
 5. The data collected enables the Bank to do a Collected advanced analytics of Customers profile to evaluate his propensity to pay, identify cross sell opportunities and collection analytics.
 6. We'll always ask for your consent before using your information for a purpose that is not covered in this Privacy Policy.

III. Sharing Of Information

1. IDFC FIRST Bank Limited and its subsidiaries are committed to protecting their customer's personal information. Personal Information means personally identifiable information such as information customer provides via forms, surveys, applications or other online fields including name, postal or email addresses, telephone, fax or mobile numbers, or account numbers.
2. Bank may use your personal information for providing products/services to you and for business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns.
3. IDFC FIRST Bank may also disclose your information to any third party if the disclosure of the same is for getting any additional service, products which may be of interest to you or bank, or for marketing and promotional purposes, as per the sole assessment and discretion of IDFC FIRST Bank.
4. IDFC FIRST Bank may also share your personal information with third parties that provide services to Bank, including companies that provide web analytics, data processing, advertising, e-mail distribution, payment processing, order fulfilment, and other services.

5. IDFC FIRST Bank recognizes the importance of protecting the privacy of all personal information provided by customer/borrower and uses appropriate technical and organizational measures in-line with its compliance and regulatory obligations for ensuring the security of personal information that is disclosed to Bank
6. We may be required to disclose your personal and financial information to the statutory authorities in connection with any legal process that may be initiated by such authorities in accordance with applicable laws.
7. We may occasionally invite selected third parties to participate in offers we feel would be attractive to Users of the App.
8. We may also share your information to provide you with superior services and a range of offers. We may use this information to advise you of products, services and other marketing materials, which we think, may be of interest to you. We may also invite visitors to this App to participate in market research and surveys and other similar activities. If one desires the Company to limit such sharing whereby one would not like to be informed of offers available one may contact us at customer.care@idfcfirstbank.com. Otherwise, the Bank will use your information to improve your experience on the App and make subsequent offers to you on products which may be of interest to you.
9. You authorize the Bank to exchange, share, part with all information related to your details and transaction history to its affiliates / subsidiaries / banks / financial institutions / credit bureaus / agencies/ advertisers / participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis and credit scoring, verification or risk management and shall not hold the Bank liable for use or disclosure of this information.

IV. YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it is used:

- a. Device-level settings: Your device may have controls that determine what information we collect.
- b. Delete your entire App account.
- c. You can also request to remove content from our servers based on applicable law.

YOUR CONSENT

By using the Website/App and/ or by providing your information, you consent to the collection and use of the information you disclose on the Website 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.

If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

COMPLAINTS AND COOPERATION WITH REGULATIONS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

1. Data transfers

We maintain your information on servers located in India. Data protection laws vary among countries, with some providing more protection than others. We also comply with certain legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

ABOUT THIS POLICY

When does this policy apply:

This Privacy Policy applies to the Services offered by the IDFC FIRST Bank Loans App.

This Privacy Policy doesn't apply to:

- a. The information practices of other companies and organizations that advertise our Services;
- b. Services offered by other companies or individuals, including products or sites that may include our Services, be displayed to you in search results, or be linked from our Services.

CUSTOMER SERVICE & CONCERNS

The customer has the right to access and rectify the personal information that we hold about you, or direct concerns to us at:

Email: customer.care@idfcfirstbank.com

*Postal Address: IDFC FIRST Bank Ltd. Building no.2, Raheja Mindspace
MIDC Industrial Area, Shiravane, Juinagar, Nerul, Navi Mumbai 400706 Maharashtra India]
Phone number - 1800 419 2332*

PRINCIPAL NODAL OFFICER:

Ms. I James

Email ID: - PNO@idfcfirstbank.com

Number: - 022-41652710

Timing – Monday to Friday – 9:30 to 6:00 pm.

Postal Address: IDFC FIRST Bank Ltd. Building no.2, Raheja Mindspace

MIDC Industrial Area, Shiravane, Juinagar, Nerul, Navi Mumbai 400706 Maharashtra India]