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**NEEV CREDIT PRIVATE LIMITED  
("NCPL")**

**PRIVACY POLICY**

Version	Date of Adoption	Change Reference	Owner	Approving Authority
1	September 5, 2022		Operations Dept	Board of Directors

Welcome to Neev Credit Private Limited  
(erstwhile Shyamji Properties Private Limited)

The domain name [www.neevfinance.com](http://www.neevfinance.com) (hereinafter referred to as "Website") is owned by Neev Credit Pvt Ltd, a company incorporated under the Companies Act, 1956 with its registered office at Room number 408, 4th Floor, PS IXL Building, Atghora, Chinar Park, Kolkata - 700136 (hereinafter referred to as "NCPL").

Neev Credit Pvt Ltd is India's emerging NBFC providing Education Loans, sanctioned under tie up with various schools/colleges/Skill training centers across India. For more information please visit [www.neevfinance.com](http://www.neevfinance.com)

We, at NCPL respect the privacy of everyone who visits this website and are committed to protecting their personal information. This Privacy Policy applies to all visitors to our Website. For the purpose of this Privacy Policy, the term "You" or "User" shall mean any natural or legal person including online and offline clients visiting this website and the term "We", "Us", "Our" shall mean Neev Credit Private Ltd.

This privacy policy ("Policy") is an electronic record in the form of an electronic contract formed under the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and is compliant with applicable laws, associated regulations and RBI guidelines. This Policy does not require any physical, electronic, or digital signature. This Policy is a legally binding document between you and NCPL. The contents of this Privacy Policy along with the Terms and Conditions ("Terms and Conditions") available at the website are applicable to all hyperlinks on the website which can be accessed at [<https://www.neevfinance.com>] ("Website"), owned by NCPL. All services provided by Neev Credit Private Limited ("NCPL") through the Website or other third-party sites ("Service Sites") will be governed by this Privacy Policy.

Use of this Website signifies your acknowledgement and consent to this Privacy Policy. If, however, You object to Your Information being used, processed and transferred by NCPL in any way, please do not share your information on the Website.

Type of Personal Information Collected:

NCPL may for the purpose of rendering its services, collect personal information as described below:

For the purpose of this policy, the term "Personal Information" shall mean any document / information you provide to us and shall include, without limitation, your name, phone no, your address, date of birth, email address, gender, photograph, occupation, financial information (such as bank account, bank account statement) or credit card or debit card or other payments details, your credit score, your PAN number., Aadhar number. identity proof document number, address proof document no, your salary slip, income tax return, TDS statement, credit information report, details from database, social media activity, log in id, and password and all details that may be requested by NCPL from time to time (collectively, "Personal Information"). Personal Information includes any and all information received by NCPL whether such information is received by email, online forms, mobile apps, telephone, facsimile, mail, physical copy or otherwise.

1. Information that may be provided by you directly, such as:
  - a. Identification Information: Name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information.
  - b. PAN, KYC Status, Signature and Photograph.
  - c. Bank account or other payment instrument details.
  - d. Any other detail which may be required by us for providing services.

2. Information that we may collect from Your use of Our services, such as:
  - a. Storage Information: We may facilitate user to download and display information which a user may refer to, or to upload relevant documents as per various processes during user account management or transaction order placement.
  - b. Media Information: We facilitate users to capture / upload relevant documents as may be required to be uploaded during user account management or transaction order placement. However, we will desist from accessing mobile phone resources like file and media, contact list, call logs, telephony functions from borrower phone resources.
3. Log File Information which shall be stored automatically:

If you visit/ log into our website just to browse, read pages or download information, certain information regarding your visit is automatically stored on our systems. This information cannot and does not identify you personally.

The kind of information that is gathered automatically include without limitation:

- a. the type of browser you are using (e.g. Internet Explorer, Firefox, etc.),
- b. the type of Operating System you are using (e.g. Windows or Mac OS) and
- c. the domain name of your Internet Service Provider, the date and time of your visit and the pages on our website.
- d. When you use our services, we can also collect information about your location, which can be determined by, among others, through GPS. The types of location data we collect depend in part on your device and accounts settings.

We sometimes use this information to improve our website(s) design, and content primarily to give you a better browsing experience.

This Policy is not intended to and does not create any contractual or other legal rights in favour of any user or viewer of [www.neevfinance.com](http://www.neevfinance.com) or on behalf of any other party.

#### Purpose of Collection and Usage of Information

On our site we collect, retain, and use information about you only when we reasonably believe that it will help administer our business or provide products, services, and other opportunities to you. Such information is collected for specified business purposes, such as:

1. to provide you with the services that might be required by you,
2. to process your financial and non-financial transaction requests,
3. to check and process your applications which may be submitted for availing any financial services,
4. to share with you any updates/changes to the services and their terms and conditions,
5. to take up and investigate any complaints/claims/disputes,
6. to respond to your queries and feedback submitted by you,
7. for verification of your identity and other parameters,
8. to fulfil the requirements of applicable laws / regulations and / or court orders / regulatory directives received by us.
9. Enforcing our rights and /or that of the Lender/Investor in case of a Borrower.
10. For Internal business purpose, such as Data analysis, research, developing new features, enhancing, and improving the experience, identifying usage trends, etc.

NCPL shall ensure that access to camera, microphone, location or any other facility necessary for the purpose of on-boarding/ KYC requirements are only with the explicit consent of the borrower.

## **Disclosure of Information**

The information provided by you may be disclosed to:

- a) RBI/SEBI/ NSE/ BSE/ MCX /Asset Management Companies of Mutual Funds / Registrar and transfer Agents / Collecting Banks / KYC Registration Agencies (KRAs) and other such agencies, solely for the purpose of processing your transaction requests for serving you better,
- b) Another business entity to carry out any business activity or re-organization, amalgamation, restructuring of business or for any other reason whatsoever,
- c) Any judicial or regulatory body,
- d) Auditors,
- e) NCPL will share the Personal Information internally with employees who are required in the course (and solely for the purpose of) to receive and analyze the information.

We will not :

- i. disclose the Personal Information to any third party without the Visitor's explicit consent unless required to do so by law.
- ii. with third parties such as internal service providers that NCPL may use to facilitate or outsource one or more aspects of the business, product and service operations; however, the Visitor shall note that these internal service providers are subject to confidentiality agreements with NCPL;
- iii. with government agencies mandated under the law to obtain information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offenses.

We shall not publish the sensitive personal data or information or disclose it further, without your consent, for any purpose other than stated above.

Personal information to exclude the following:

- Credit or debit card
- Redacted Aadhar card.

## **Right to withdraw consent:**

You have the option, at any time while availing our Services or otherwise, to withdraw your consent given to us, for processing your data. In case of withdrawal of your consent, we reserve the option not to provide the Services for which such information was sought. In case the Services are already availed and then you raise a request to withdraw consent, then we have the right to retain all the necessary data required to carry out our operations. The user can exercise the same by mailing us at [contactus@neevcredit.com](mailto:contactus@neevcredit.com).

## **Retention of Information**

NCPL shall not retain or store such information for periods longer than is required for the purposes except when the information may lawfully be used or is otherwise required under any other law for the time being in force.

By agreeing to avail the services offered by NCPL, you have agreed to the collection and use of your Sensitive Personal Data or Information, as well, by NCPL. You always have the right to refuse or withdraw your consent to share/disseminate your Sensitive Personal Data or Information by

contacting the customer care. However, in the event of your refusal or withdrawal of personal data, you shall not be able to avail any services of NCPL to the fullest extent.

NCPL provides all Users with the opportunity to opt-out of receiving non-essential (promotional, marketing-related) communications. If the Visitor does not want to receive commercial email or other mail from NCPL, he/she/it can opt-out of receiving information by using the "unsubscribe" option in any marketing e-mail or send an email at [contactus@neevcredit.com](mailto:contactus@neevcredit.com).

NCPL shall ensure that no biometric data is stored/ collected in the systems , unless allowed under extant statutory guidelines.

NCPL shall ensure that all permissible data is stored only in servers located within India, while ensuring compliance with statutory obligations/ regulatory instructions.

### **Communications & Notifications**

When You use the Website or send emails or other data, information or communication to us, You agree and understand that You are communicating with us through electronic mode and You consent to receive communications from us periodically. We may send notifications to you via email or in writing as a hard copy notice, or through conspicuous posting of such notice on our Website page. You may choose to opt out of certain means of notification as you may deem fit.

### **Updating or Reviewing Your Information**

You may upon written request to us review the personal data or information provided by You. NCPL shall ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible.

### **Reasonable Security Practices for Protecting Your Information**

NCPL uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. These include internal reviews of our data collection, storage and processing practices and security measures, such as appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

All information gathered on said website is securely stored within the NCPL controlled database. The database is stored on secured servers; access to which is password-protected and is strictly limited.

To protect your privacy and security, NCPL takes reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from NCPL, at all times.

Although we use security measures to help protect your personal information against unauthorised disclosure, misuse or alteration, as is the case with all computer networks linked to the internet, NCPL cannot, however, ensure or guarantee the security of any information you transmit to NCPL and you do so at your own risk. Once we receive your transmission of information, NCPL makes commercially reasonable efforts to ensure the security of such information.

In order to make every effort to ensure that the Visitor's experience at the Website is secure, NCPL uses encryption technology to protect the Visitor against the loss, misuse, or alteration of the Personal Information. To keep the Personal Information safe, NCPL ensures that sensitive and private data exchanges between the Visitor and the Website takes place over a Secure Sockets Layer (SSL)-secured communication channel and are encrypted and protected with digital signatures. SSL-secured communication channels are specially designed to protect personal and sensitive information (payment details), which is sent over the internet.

NCPL store and process all data relating to its activities and participants on hardware located within India.

**Data Destruction Protocol:**

To ensure that personal data is kept for no longer than necessary, the organisation shall delete the KYC documents like PAN, Aadhar and other OVD Documents of the user possessed for processing their loan application within 48 hours from date of disbursement or rejection of the application. The user can also reach us to delete his/her account and information by mailing us at [contactus@neevcredit.com](mailto:contactus@neevcredit.com) subject to closure of all the ongoing services.

**Steps for handling security breach**

1. Move quickly to secure the systems and fix vulnerabilities that may have caused the breach.
2. Switch off the servers and change the access code to prevent additional data loss.
3. Mobilize the breach response team right away to prevent additional data loss.
4. Additional security required will be placed.
5. Securely delete personally identifiable information (PII) and other sensitive data when it no longer needed for business purposes.
6. If any security breach comes to our knowledge, then we may take all steps required to protect misuse of such information and may attempt to notify you electronically so that you can take appropriate steps.
7. Shall report security breach to concerned authority and all stakeholders in timely manner.

**Limitation of Liability:**

- a) We shall use generally accepted industry standards to protect the User 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 User information, we cannot guarantee its absolute security and your use of the website is at your sole risk and discretion. We also cannot warrant that such User information may not be misused in the event our safeguards and protocols are breached by a malicious third-party. Further, we are not liable to, nor can we fully control the actions of other users with whom you may choose to share your information.
- b) The Visitor agrees that NCPL or NCPL's third party service providers can collect the Visitor's IP address or other unique identifiers. At times, NCPL also uses these identifiers to collect information regarding the frequency with which the Visitor visits various parts of the Website.
- c) NCPL, either itself or through affiliates or group companies may combine the Visitor's internet protocol address with other personal information for NCPL's own marketing and for market research purposes, including internal demographic studies, to optimize NCPL's products and services and customize the Website.
- d) The Visitor acknowledges that all discussion for ratings, chat rooms and/or other message or communication facilities (collectively "Communities") are public and not private communications, and that, therefore, others may read the user's communications without the Visitor's knowledge. NCPL does not control or endorse the content, messages or information found in any Community, and, therefore, NCPL specifically disclaims any liability concerning the Communities and any actions resulting from the user's participation in any Community, including any objectionable content. If particular web pages permit the submission of communications that will be treated by NCPL as confidential, that fact will be stated on those pages. By posting comments, messages or other information on the Website, the Visitor grants NCPL the right to use such comments, messages or information for promotions, advertising, market research or any other lawful purpose.

- e) NCPL keeps the Personal Information for only as long as required to fulfill the purpose for which it was collected. If the Visitor wishes to prevent any such usage by NCPL, the Visitor shall inform NCPL immediately. The Visitor can exercise this right at any time by contacting NCPL at [[contactus@neevcredit.com](mailto:contactus@neevcredit.com)].
- f) Notwithstanding anything contained in this Policy or elsewhere, NCPL/we shall not be held responsible for any loss, damage, or misuse of your Personal Information, if such loss, damage, or misuse is attributable to a Force Majeure Event. A Force Majeure Event shall mean any event that is beyond the reasonable control of NCPL and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes, lockouts or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, civil disturbances, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, and any other similar events not within the control of NCPL and which NCPL is not able to overcome.
- g) You Acknowledge that the internet is inherently insecure, and NCPL cannot prevent and is not responsible for interception or 'hacking' of information transmitted through this site by unauthorized third parties.

### **Links to Other Web Sites**

Please note that this Privacy Policy does not extend to third party sites linked to this website. NCPL is not responsible for the content and the privacy practices of such linked websites. It is advisable to read each such linked website's privacy statement prior to sharing any information.

### **Changes to Our Privacy Policy**

Please note that this policy may change from time to time. If We change our privacy policies and procedures, we will post the changes on the Website to keep you updated. Changes to this Policy shall become effective on the day they are posted on this page. Please visit our website to keep yourself abreast of any changes to this Policy.

### **Cookie Policy**

- **Date of most recent update: 5<sup>th</sup> September 2022**

### **Cookies usage**

A cookie is a small file placed on the hard drive of your computer. Most websites use cookies. We use cookies to track your use of the website and provide you with a more personalized user experience. You can choose either to accept or decline cookies. Most web-browsers automatically accept cookies, but you can change your browser settings to decline cookies as well.

### **Grievance Redressal:**

Any discrepancies and grievances related to the processing and use of Your information can be raised to the grievance officer appointed by NCPL. For further details please visit Grievance Redressal Policy on our website.