

PRIVACY POLICY

Effective from November 30, 2022

Northern Arc Capital Limited (“**Company**”, “**we**”, “**our**”, or “**us**”) is committed to protecting privacy of personal information. This privacy policy (“**Privacy Policy**”) outlines the collection, use, safeguard, disclosure and sharing of personal information by us. Personal information refers to sensitive personal information and personally identifiable information.

This Privacy Policy applies to personal information that we collect online through our websites and its associated subdomains, mobile applications, and by way of emails or such other forms of online channels. This Privacy Policy also applies to (a) personal information as indicated below under the heading ‘Collection of Personal Information we may collect directly or through our third-party service providers and (b) your personal information in your financial transactions with us.

By providing us with your personal information you acknowledge that we will in accordance with applicable law collect, store, use, process, disclose and share your personal information in terms of this Privacy Policy.

Collection of Personal Information

Personal information we collect could be categorised as “voluntarily provided” information and “automatically collected” information and the same will be collected in accordance with applicable laws.

“Voluntarily provided” information refers to any information you knowingly and actively provide us when using our websites or mobile applications, or applying for any of our products or services.

“Automatically collected” information refers to any information automatically sent by your devices or received from your devices and about your devices in the course of you accessing our websites or mobile applications or in relation to using of any of our products and services. The term ‘device’ refers to any internet connected device such as a phone, tablet, computer or any other device that can be used to visit our websites or operate our mobile applications.

Purpose

Personal information we collect may be used for the following purposes but shall not be limited to them:

- To provide you with information about our offerings and/or our periodic newsletters;
- To respond to your requests, queries;
- To provide support, redressal of grievances;
- For creation or development of business intelligence or data analytics in relation to the offerings provided by us (for this purpose we may share the personal information with certain software or tools available online);
- To manage our relationship with you;
- For internal record keeping;
- To provide you with authorization to login and access your user account;

- To verify your identity;
- To maintain correct and up-to-date information about you;
- To improve our websites and mobile applications;
- To otherwise be able to provide the services to you; and
- To comply with our legal or statutory obligations.

Credit and investment products and services

Company may collect from its applicants, its customers, and users of its websites and its mobile applications personal information such as documents of proof of identity & address, contact details, bank account details, demat account details, credit information and risk profile, and process and store them towards:

- evaluating credit applications and performing credit risk assessments;
- evaluating investment applications;
- providing products and/or services;
- meeting the requirements under law as regards customer identification process; and
- maintenance, preservation and reporting of customer account information as stipulated under applicable laws.

Social Media

We may also directly or indirectly collect information that is made publicly available on social media websites. You can control how much of your information social media websites make public by visiting these websites and mobile applications and changing your privacy settings. We may also directly or indirectly collect information under legitimate framework from credit bureaus, registries, account aggregators and other regulated entities.

We may combine voluntarily provided and automatically collected personal information with general information or research data we receive from other trusted sources. For example, our marketing and market research activities may uncover data and insights, which we may combine with information about how visitors use our websites and mobile applications to improve them and your experience on it.

Related Persons

We may collect information about related persons, co-applicants, guarantors, nominees, ultimate beneficial owners, etc. to comply with applicable laws or in connection with evaluation of credit or risk profile. Where you provide us with such details, you confirm that you have the necessary consents and permissions to share such details with us.

Payments processing

In the event you make any payment on our websites or mobile applications through a payment gateway, or register for scheduled automatic payment services, details of your credit card, debit card and such other payment instruments; bank account number and other similar financial information

may be saved to facilitate easy payment. You understand and acknowledge that payment gateways are operated by third-party service providers and the terms, conditions, and privacy policy of such service provider shall be applicable in relation to the use of the payment gateway.

Disclosure of Personal Information

Other than in accordance with this Privacy Policy, we will not without your prior consent disclose personal information we received from you to any third party unless such disclosure has been contractually permitted, or where the disclosure is necessary for compliance with applicable laws. You acknowledge that it is normal in the course of our business of financial institutions to assign debt, transfer securities, and to create charge over receivables and securities which they are legally entitled to do so. Such assignment, transfer or charge creation will entail sharing of personal information to the assignee, transferee or person in whose favour charge is created. We may disclose your personal information to protect and defend the legal rights, interest or properties of Northern Arc or its affiliates like establishment, exercise or defence of legal claims.

We may engage third party service providers to perform functions and provide services to us, such as hosting and maintaining our servers, websites and mobile applications management, conducting surveys or contests, third-party solutions for marketing and analytics, application developers, database storage and management, data hosting, e-mail management, payments processing, some aspects of our technical and customer support, collections and recovery. In order to enable these third parties to perform these services for us and for you we may share your personal information, and possibly some non-personal information, with them after imposing confidentiality obligations on them.

Links to other websites

Our website and mobile applications may contain links to other websites and mobile applications that are not operated by us. If you click on a third-party link, you will be directed to that third party's site or mobile application. We strongly advise you to review the privacy policy and terms of use of every site you visit and every mobile application that you use. Third parties are under no obligation to comply with this Privacy Statement with respect to personal data that you provide directly to those third parties or that those third parties collect for themselves. We do not control the third-party websites or mobile applications that may be accessible through our websites or mobile applications. Thus, this Privacy Statement does not apply to information you provide to third-party websites or mobile applications or gathered by the third parties that operate them. Please be aware that we have no control over the content and policies of those websites or mobile applications and we cannot accept responsibility or liability for their respective privacy practices.

Protection of Personal Information

We take precautions to protect the security of your personal information. Such security practices and procedures as stipulated under applicable law will be applied on the personal information we collect from you. To protect privacy of your personal information, we implement a variety of security measures to maintain the safety of your personal information. Please be aware that we cannot rule

out breach of privacy of your personal information on account of breach of any of our physical, technical, or managerial safeguards.

Where we receive your personal information through the digital lending applications of our loan service providers, we require them to have privacy policies to govern the personal information they collect from you. Collection of your personal information through our digital lending applications will be need-based and with your prior and explicit consent and the purpose of obtaining consent will be disclosed at each stage of interface. Your explicit consent will be taken before sharing your personal information with any third party, except for cases where such sharing is required as per applicable law.

Third parties that are service providers to the Company with whom personal information will be shared by the Company will be required to provide access to such personal information to its personnel only on a need-to-know basis.

Restricted Access

Access for our personnel to personal information will only be on a need-to-know basis that is relevant for their respective function. Where it will suffice, access will be provided to depersonalized/anonymized/pseudonymized information as appropriate.

Policy guidelines on storage of personal information

Chief Technology Officer and/or Chief Information Security Officer in consultation with the Chief Compliance Officer and Chief Legal Counsel shall lay down clear policy guidelines regarding the storage of customer data including the type of data that can be stored, the length of time for which data can be stored, restrictions on the use of data, data destruction protocol, standards for handling security breach, etc., Such guidelines will also be updated from time to time and always displayed prominently on our websites and mobile applications.

Grievance Redressal

In case of any privacy concern, complaint or any question regarding this Privacy Policy, you may contact the Grievance Redressal Officer:

Title: Grievance Redressal Officer

Address: Northern Arc Capital Limited, IIT M Research Park, Phase 1, 10th Floor, No. 1, Kanagam Village, Taramani, Chennai – 600 113

Toll Free Number: 1800 4198 766

Email ID: gro@northernarc.com

Support

If you have any other questions or require any support regarding this Privacy Policy, please do not hesitate to contact us by sending an e-mail to customersupport@northernarc.com.

Rectification and Erasure of Personal Information

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please write to customersupport@northernarc.com with the subject line "Rectification Request". We will take reasonable steps to correct any personal information found to be inaccurate, incomplete, misleading, or out of date. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion.

If you require any personal information of yours in our possession to be deleted wholly or partially, you may write to customersupport@northernarc.com with the subject line "Erasure Request". We will consider deleting such personal information subject to our obligations under applicable laws, our rights and obligations under contracts, and our legitimate interests including for the establishment, exercise or defence of legal claims if such personal information is no longer necessary for the purpose for which it was originally collected or processed for.

If you are an employee, intern or apprentice of our Company or an applicant for any role in our company, we collect information you voluntarily provide to us. We use the information collected for human resources management purposes, administrative purposes including compliance with applicable laws and to screen applicants. Employees, interns, apprentices, may update or correct their personal information as detailed in our internal human resources policies. If you are an applicant and you would like to update, correct, change or delete any of your personal information in our possession, you may write to grievances@northernarc.com. If the request is to update, correct or change any personal information, we will take reasonable steps to correct any personal information found to be inaccurate, incomplete, misleading, or out of date.

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your information may exist in a non-erasable form that will be difficult or impossible for us to locate. Personal information that has been deleted pursuant to any request for deletion will not be retrieved for use thereafter.

Non-Binding

Please note that this privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

Notification of data breaches

We will comply with applicable laws applicable to us in respect of any data breach.

Changes to this policy

At our discretion, we may make changes to this Privacy Policy to reflect updates in our business processes, upgrades in our privacy standards and procedures, or legislative or regulatory changes. You acknowledge that any such change of policy will be effective from the date of posting on our websites and the notification of the same shall be published on our websites.