PRIVACY POLICY

Of

CHHOTARIA SECURITIES PRIVATE LIMITED

1. Introduction and Scope

Chhotaria Securities Private Limited ("Chhotaria", the "Company", "we", "us" or "our"), a company incorporated under the Companies Act, 2013, having its registered office at 3rd Floor, IB Eling Road, A.J.C.Bose Road, Kolkata, West Bengal, India – 700020 and corporate office at Offices No. 425 - 455, 4th Floor, Magneto Offizo, Raipur (C.G.) – 492006 is a Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India ("RBI") and classified under the Base Layer of the RBI's Scale Based Regulation framework, engaged in the business of lending.

The Company does not own or operate any mobile application or website of its own for sourcing or servicing loans. Loans are sourced, facilitated and serviced through the digital lending applications and platforms ("DLAs") of Lending Service Providers ("LSPs") engaged by the Company, who act on behalf of the Company under written outsourcing agreements. Your personal data is accordingly collected by, or through, the DLAs of our LSPs, on our behalf and for the purpose of providing you loan products of the Company.

As the regulated entity and lender, the Company remains responsible for the acts of its LSPs in relation to the collection, storage, processing and protection of your personal data, in accordance with the Reserve Bank of India (Digital Lending) Directions and other applicable RBI guidelines on outsourcing. This Policy is issued in accordance with the Digital Personal Data Protection Act, 2023 ("DPDPA") and the rules framed thereunder, and the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules"), to the extent applicable. As a data fiduciary under the DPDPA, we (together with our LSPs acting as data processors on our behalf) process personal data in accordance with the principles of data minimisation, purpose limitation, accuracy, storage limitation, integrity, confidentiality and accountability.

This Policy explains what personal data is collected from you through our LSPs' DLAs, how it is used, with whom it is shared, how it is protected, and the rights available to you. This Policy should be read together with the privacy policy published on the DLA of the LSP through which you avail the loan, the Key Fact Statement ("KFS") and the loan documentation provided to you.

"You" or "Your" refers to any person who applies for, avails of, or enquires about a loan product of the Company through the DLA of any of our LSPs ("Borrower" or "User"). You must be a natural person who is at least 18 (eighteen) years of age and competent to contract under the Indian Contract Act, 1872. We do not knowingly process the personal data of any person below 18 years of age.

By applying for or availing a loan from the Company through an LSP's DLA, and by providing your consent on such DLA, you consent to the collection, use, processing, storage and disclosure of your information in accordance with this Policy. If you do not agree with this Policy, please do not apply for or avail our loan products.

2. Our Lending Service Providers

The Company currently engages the following LSPs, whose DLAs are used to source and service loans on our behalf:

Sl. No.	Lending Service Provider	Registered Address	DLA (App/Website)
1	Innotech Creditsea Platforms Private Limited	So – 11 3Rd Floor Magneto, The Mall Telibanda, Raipur, Chattisgarh, India – 492001	https://www.creditsea.com/
2	Cash247 Cash247 Money Fintech Private Limited	510-511, Tower B, Bhutani Alphathum, Sector 90, Bhutani	https://www.cash247.in/

		Alphathum, Sector 90, Nepz Post Office, Gautam Buddha Nagar, Uttar Pradesh, 201305	

Any change to the list of LSPs or their DLAs will be updated in this Policy and reflected in the disclosures required under applicable RBI directions.

3. Information Collected Through Our LSPs

In the course of your loan application and the servicing of your loan, the following categories of information may be collected from you by our LSPs, through their DLAs, on our behalf:

3.1 Personal and Financial Information

- Name, address, date of birth, gender, marital status, contact details (e-mail address and phone number).
- Know Your Customer ("KYC") information and documents, such as PAN, officially valid documents for address and identity proof, and photograph.
- Financial information, such as primary bank account details, bank statements, salary slips and similar financial documents.
- Employment details, including occupation, work experience, income details, employer name and office address.
- Credit-related information obtained from Credit Information Companies and similar sources.
- Loan account details, repayment and transaction history.
- Any additional information required to be collected pursuant to RBI directions or other applicable law.

3.2 Device and Application Permission-Based Data

The DLAs of our LSPs may, strictly on a need basis and only with your explicit prior consent for each permission, access certain resources of your mobile device. In accordance with RBI's Digital Lending Directions, the DLAs shall not access your mobile phone contact list, call logs, telephony functions or media files; camera, microphone, location or any other facility necessary for onboarding/KYC may be accessed only with your explicit one-time consent, which you may deny or withdraw. Subject to the above, the following may be collected:

- **Camera and microphone:** one-time access for capturing KYC documents, photographs, and conducting video-KYC or two-way communication with representatives.
- **Photo library / file storage:** access limited solely to the specific files you select for uploading documents required for KYC or the Services.
- **Device information:** device name, model, operating system, region and language settings, and unique device identifiers, used for account security, fraud prevention and service stability.
- **Usage and network data:** application usage logs, crash reports and network status

information, used for customer support, performance improvement and fraud-risk analysis.

3.3 Reference Contact Information

You may be asked to voluntarily furnish reference contact details for credit verification purposes and to enable us or our LSPs to reach you in case you are unavailable on your registered number. Such references are used only for these purposes.

3.4 Non-Personal Information and Cookies

The DLAs may collect certain non-identifying information and use cookies or similar technologies to recognise you, improve usability and analyse usage patterns. Such information is governed by the privacy policy of the relevant LSP's DLA read together with this Policy.

4. Consent

Your personal data is collected and processed only after your free, specific, informed and unambiguous consent is obtained through the LSP's DLA, by way of a clear affirmative action, as required under the DPDPA. The purpose of each collection is disclosed to you at the time of seeking consent.

You may withdraw your consent at any time, or deny consent for the use of specific data or the collection of data from your device, by writing to the Grievance Redressal Officer identified in Section 12 or through the options provided on the relevant DLA. You may also ask the Company and its LSPs to delete the data collected from you or restrict its disclosure to third parties. Withdrawal of consent will not affect the lawfulness of processing carried out before withdrawal, but may limit or discontinue our ability to provide or continue certain services (including assessment of loan eligibility or disbursal), and remains subject to applicable law and the terms of any sanctioned loan.

5. Use of Information

The information collected through our LSPs is used by the Company, and by the LSPs on our behalf, strictly for the following purposes:

- To assess your loan eligibility, creditworthiness and applicable loan parameters, and to underwrite the loan.
- To create, verify, administer and service your loan account, including collection and recovery of dues.
- To conduct KYC and comply with anti-money laundering requirements (directly or through service providers).
- To manage risk and detect and prevent fraud against us, our LSPs, our partners or other borrowers.
- To send service communications and notifications relating to your loan, and, only where you have separately consented, promotional communications by SMS, e-mail, call or other means.
- To provide customer support and resolve your queries or grievances.

- To carry out data analysis to improve our products and services.
- To comply with applicable law, RBI directions and other regulatory requirements, court or regulatory orders, to resolve disputes, enforce our agreements and protect the Company's rights and property.

Personal information of borrowers is not sold to any third party. Biometric data, if any, is not stored or collected by the Company or its LSPs unless permitted under extant statutory guidelines.

6. Disclosure of Information

We disclose your information strictly on a need-to-know basis, with your consent (except where disclosure is required by law), to the following categories of recipients:

- Our LSPs and their sub-contractors, for sourcing, facilitating, servicing and recovering loans on our behalf, under written agreements imposing confidentiality and data-protection obligations.
- Banks, payment gateways, payment aggregators and financial service providers, for disbursal and collection of loan amounts.
- KYC and verification service providers, for identity, employment and creditworthiness verification.
- Credit Information Companies, as required under RBI directions and the Credit Information Companies (Regulation) Act, 2005; where information is disclosed to Credit Information Companies, we furnish accurate and complete data through a secure medium in the prescribed format.
- Collection and recovery agencies engaged by us or our LSPs, for recovery of dues, in accordance with the Fair Practices Code and RBI directions; the details of such agencies, where applicable, are communicated to the borrower as required.
- Statutory, regulatory, judicial or governmental authorities, where required to comply with a legal obligation, court order or direction.
- Professional advisers, auditors and insurers, under obligations of confidentiality.
- Any person in connection with a corporate restructuring, merger, assignment or transfer of the loan portfolio, subject to applicable law.

Any third party receiving your information is bound by confidentiality obligations restricting further use or disclosure beyond the stated purpose. Details of the specific third parties engaged in respect of your loan are available in the KFS and loan documentation, and may also be obtained from the Grievance Redressal Officer.

7. Storage, Localisation and Security

All data collected through the DLAs of our LSPs is stored on secure servers located in India. No biometric data is stored unless permitted under extant statutory guidelines. The Company ensures, through its agreements with LSPs, that:

- Data is encrypted in transit and protected by reasonable security practices, including firewalls, access controls and authorisation mechanisms.

- LSPs collect only need-based data with the borrower's prior explicit consent and maintain an auditable trail of such consent.
- LSPs do not store personal information of borrowers beyond what is required to carry out their functions, and purpose-based data is deleted once the purpose is served, subject to legal retention requirements.
- One-time access permissions (camera, microphone, etc.) are not used beyond the stated purpose.

No method of electronic transmission or storage is entirely secure. While we and our LSPs take all reasonable steps to protect your information, transmission of information over the internet carries inherent risk.

8. Data Breach

We maintain, and require our LSPs to maintain, physical, technical and operational measures consistent with applicable law to preserve the integrity and security of the information held, including restricted database access and backup and recovery mechanisms. In the event of a personal data breach, we shall notify the Data Protection Board of India and affected individuals in the form and manner prescribed under the DPDPA and the rules thereunder, and shall take appropriate remedial measures.

9. Data Retention and Your Rights

We retain your information only for as long as necessary to provide and service the loan, comply with legal and regulatory obligations (including RBI record-keeping requirements), resolve disputes, prevent fraud and enforce our agreements, and not beyond what is required for these purposes.

Subject to applicable law, you may exercise the following rights by writing to the Grievance Redressal Officer identified in Section 12:

- **Access:** obtain a summary of the personal data being processed and the processing activities undertaken.
- **Correction and Rectification:** request correction, completion or updating of your information; you also agree to promptly inform us of any change to information previously submitted.
- **Erasure:** request deletion of your personal data, subject to our right/obligation to retain information required by law or for the servicing of an outstanding loan.
- **Withdrawal of Consent / Restriction:** withdraw consent or restrict disclosure to third parties, as described in Section 4.
- **Grievance Redressal:** raise a grievance regarding the processing of your personal data, which we will address within the timelines prescribed under applicable law and RBI directions.
- **Nomination:** nominate another individual to exercise your rights in the event of death or incapacity, as provided under the DPDPA.

We may continue to retain and use basic information (such as name, contact details, transaction history and address) as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

10. Governing Law and Jurisdiction

This Policy is governed by the laws of India. The courts at Kolkata shall have exclusive jurisdiction over any disputes arising out of or in connection with this Policy.

11. Amendments

We may revise this Policy periodically, including to reflect changes in law, RBI directions, or our arrangements with LSPs. The updated Policy will be made available on the DLAs of our LSPs and/or communicated as required. You are encouraged to review this Policy from time to time. If any provision of this Policy is held invalid or unenforceable, the remaining provisions shall continue in full force and effect. No failure or delay by us in exercising any right under this Policy shall operate as a waiver of that right.

12. Grievance Redressal Officer / Contact Us

In accordance with RBI's Digital Lending Directions, the Company and its LSPs have designated nodal grievance redressal officers to deal with complaints relating to digital lending and data. For any queries, grievances or requests regarding this Policy or the use of your personal information, please contact:

Grievance Redressal Officer, Chhotaria Securities Private Limited

Name: Mr. Vishesh Saigal

Email: grievance@chhotarisasecurities.com

Phone: +91 91099 57390

Registered Office: 3rd Floor, IB Eling Road, A.J.C.Bose Road, Kolkata, West Bengal, India - 700020

Corporate Office: Offices No. 425 - 455, 4th Floor, Magneto Offizo, Raipur (C.G.) – 492006

Working Hours: Monday to Saturday (Timing- 10:00 AM to 6:00 PM)

If your grievance is not redressed within the period prescribed under applicable RBI directions, you may lodge a complaint over the Complaint Management System (CMS) portal under the Reserve Bank – Integrated Ombudsman Scheme.