

# PRIVACY POLICY

This Privacy Policy ("Privacy Policy") has been prepared by **Chhotaria Securities Private Limited** ("Chhotaria", "Company", "We", "Our", "Us"), a company incorporated in India under the Companies Act and registered as a **Non-Banking Financial Company (NBFC)** with the **Reserve Bank of India ("RBI")**.

The Company provides financial and credit-related services to its users ("You", "Your", "User") through its official website(s) (<https://www.chhotariasecurities.com/>). The Website enables Users to access information, submit enquiries, initiate applications and avail services offered by the Company in accordance with applicable laws and regulatory guidelines.

This Privacy Policy summarises the various categories of information or data ("Information") collected from Users, the manner in which such Information is collected, processed and shared, the purpose of collection, the retention period, the entities that may have access to such Information, and whether providing such Information is mandatory or optional for availing the services offered by the Company through the Website.

Users are advised to carefully read this Privacy Policy along with the Terms of Use and other disclosures made available on the Website. Any statements or information provided on the Website shall not be construed as an offer, commitment or assurance to provide any financial service.

This Privacy Policy has been formulated in compliance with the following applicable laws and regulations:

1. The Information Technology Act, 2000 ("IT Act")
2. The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011
3. The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021
4. The Digital Personal Data Protection Act, 2023 ("DPDP Act") and rules issued thereunder
5. Guidelines on Digital Lending issued by the Reserve Bank of India, as amended from time to time.
6. Other applicable statutes, rules, regulations, circulars and guidelines issued by competent regulatory authorities, including the Reserve Bank of India.

## 1. USE OF OUR WEBSITE OR SERVICES

This Privacy Policy forms an integral part of and shall be read in conjunction with the **Terms of Use** governing access to and use of the Company's Website. By accessing, browsing or using the Website, You acknowledge that You have read, understood and agreed to be bound by the terms of this Privacy Policy.

**Chhotaria Securities Pvt Ltd**

*Neelam*  
**Director**

## 2. COLLECTION OF INFORMATION

### 2.1 Information We Collect Through Our Website

**2.1.1** All Information collected by the Company for the purpose of providing its services through the Website is obtained through the following means:

**2.1.1.1** Information provided by You by filling forms available on the Website, including enquiry forms, registration forms or application forms;

**2.1.1.2** Information provided by You while communicating with the Company through email, chat, contact forms or other communication channels available on the Website;

**2.1.1.3** Information provided by You at the time of submitting an application, requesting information or availing any service offered through the Website;

**2.1.1.4** Information provided by You when You report a problem, submit feedback or raise a grievance in relation to the Website or services;

**2.1.1.5** Information received by the Company from third parties, where applicable, pursuant to consents provided by You and in accordance with their respective privacy policies; and

**2.1.1.6** Information generated as a result of Your use of and interaction with the Website.

**2.1.2** All Information accessed or collected by the Company is processed, stored and shared in a secure manner. The Company ensures that all recipients of personal Information adhere to applicable data protection, confidentiality and secrecy obligations and are bound by appropriate contractual safeguards.

**2.1.3** This Privacy Policy clearly identifies the Information that is mandatory and optional. In the event you choose not to provide any mandatory Information, the Company reserves the right to deny access to the Website or provision of services.

**2.1.4** The personal Information collected by the Company through the Website, the purpose for which such Information is collected and whether such Information is mandatory or optional for availing services is detailed below:

#### Customer Profile Creation and Underwriting

S. No.	Information Category	Purpose	Mandatory / Optional
1	Personal and Demographic Information including name, mobile number, email ID,	Account creation, identity verification, customer KYC, fraud prevention, communication,	Mandatory

	gender, date of birth and address	customer support and legal compliance	
2	Asset Information	Underwriting and assessment of financial repayment capability	Optional
3	PAN and Credit Information obtained from credit bureaus	Underwriting and legal compliance	Mandatory
4	Device, browser and technical information including IP address, log data and website usage information	Identity verification, fraud prevention and security	Mandatory
5	KYC Information	Identity verification, fraud prevention and regulatory compliance	Mandatory
6	Geolocation and IP-based information	Identity verification and fraud prevention	<b>Mandatory*</b>
7	Reference Information voluntarily provided by You	Identity verification, fraud prevention and repayment follow-up	Optional
8	Transaction Information	Legal and regulatory compliance	Mandatory

9	Usage Information (website navigation, time spent, interaction logs)	Enabling and improving services offered through the Website	Mandatory
10	Feedback and Similar Information	Improving services, addressing issues and enhancing user experience	Mandatory
11	Risk Evaluation Information received from payment or verification service providers	Underwriting and risk assessment	Mandatory

**\*Geolocation data is collected on need basis and not for continuous tracking.**

#### **Personal Loan**

<b>S. No.</b>	<b>Information Category</b>	<b>Purpose</b>	<b>Mandatory / Optional</b>
12	Employment Information	Underwriting and assessment of repayment capability	Mandatory for salaried individuals
13	Financial Information	Underwriting and assessment of repayment capability	Mandatory for salaried individuals



## Business Loan

S. No.	Information Category	Purpose	Mandatory / Optional
14	Business Information	Underwriting and assessment of repayment capability	Mandatory
15	Financial Information	Underwriting and assessment of repayment capability	Mandatory

## Credit-Related Information Services

S. No.	Information Category	Purpose	Mandatory / Optional
16	Personal Information including mobile number, email ID, address and PAN	Enabling credit-related information services	Mandatory

## 2.2 COLLECTION OF OTHER NON-PERSONAL INFORMATION

**2.2.1** The Company may automatically collect certain non-personal and technical information based on Your interaction with the Website, including browser type, device details, operating system and usage patterns. Such information is used for internal analysis relating to user demographics, interests and behaviour, with the objective of improving the Website, strengthening security and enhancing services. This information is analysed on an aggregated basis and does not identify individual Users.

### 2.2.2 Cookies

Cookies are small data files stored on Your device by the Website. Cookies assist the Company in recognising returning Users and improving Website functionality and user experience. The Company does not store personal or identity information in cookies. You may choose to disable cookies through browser settings; however, doing so may impact certain features of the Website.

### 2.2.3 Website Interaction Records

If You communicate with the Company through emails, enquiry forms or other correspondence, such information may be stored in records associated with You. This Information is retained to resolve disputes, provide customer support and address issues as permitted under applicable law.

## 2.3 INFORMATION COLLECTED FROM THIRD PARTIES

**2.3.1** For the purpose of providing services through the Website and completing verification, underwriting and compliance checks, the Company may collect Information about You from the following third parties, in accordance with applicable laws and based on consents provided by You:

S. No.	Third Party	Type of Information Collected
1	Unique Identification Authority of India (UIDAI)	KYC and identity verification information
2	Account Aggregators and Financial Institutions	Bank statements and related financial information
3	Central Registry of Securitisation Asset Reconstruction and Security Interest (CERSAI)	CKYC records
4	Payment Gateway or Risk Assessment Service Providers	Risk evaluation or verification scores
5	PAN Verification Agencies / NSDL	PAN verification records
6	DigiLocker or similar authorised platforms	KYC documents
7	Credit Information Companies / Credit Bureaus	Credit reports and credit scores
8	Official GSTIN verification systems	GST registration information
9	Udyam Registration Database	Udyam registration details

**2.3.2** The Company collects and uses such Information strictly on a need-to-know basis for the purpose of verification, due diligence, underwriting, risk assessment and compliance with applicable laws. The consents obtained from You in relation to accessing Information from third parties are detailed under Section **2.5** of this Privacy Policy.

## **2.4 INFORMATION COLLECTED THROUGH THE WEBSITE**

### **2.4.1 Website-Based Services**

<b>S. No.</b>	<b>Information</b>	<b>Purpose</b>	<b>Mandatory / Optional</b>
1	Personal Information such as name, email address, mobile number, address and date of birth	Website functionality, account management, communication and compliance	Mandatory
2	Approximate Location (derived through IP address)	Website security, fraud prevention and compliance	Mandatory
3	Device and Browser Information including IP address, log information and access timestamps	Website functionality, security and analytics	Mandatory
4	Website Performance Information such as error logs and diagnostics	Analytics and performance improvement	Mandatory
5	Documents uploaded voluntarily through the Website	Verification, customer support and compliance	Optional
6	Financial Information provided through Website forms	Underwriting and verification	Mandatory where applicable

## 2.5 CONSENTS SOUGHT AS PART OF RENDERING SERVICES (THROUGH THE WEBSITE)

The Company obtains the following consents from Users at various stages for the purpose of providing services through the Website, completing verification, underwriting and complying with applicable laws:

S. No.	Nature of Consent Sought	Purpose	Mandatory / Optional
1	Consent confirming that You have read and agreed to the Terms of Use and this Privacy Policy	Website access and service enablement	Mandatory
2	Consent to receive service-related and promotional communication through SMS, Email or WhatsApp	Communication and service updates	Mandatory at registration (opt-out available later)
3	Consent for verification of PAN through authorised PAN databases	Customer KYC	Mandatory
4	Consent to increase or revise eligible limits (if applicable)	Underwriting	Optional
5	Consent for submission of Aadhaar in masked or permitted form	Customer KYC	Mandatory if option is availed
6	Consent to fetch CKYC records from CERSAI	Customer KYC	Mandatory
7	Consent confirming declared income details	Underwriting	Mandatory
8	Consent to accept terms for completing video or assisted KYC (if applicable)	Underwriting	Mandatory
9	Consent for submission of electronic KYC	Customer KYC	Mandatory if option is availed



10	Consent to verify Udyam registration details (if applicable)	Underwriting	Mandatory where applicable
11	Consent to avail insurance-related services (if applicable)	Service enablement	Mandatory if option is chosen
12	Consent to fetch credit report from credit information companies	Underwriting and servicing	Mandatory
13	Consent to collect limited financial communication information (where permitted)	Fraud prevention and underwriting	Optional
14	Consent to obtain financial information from account aggregators	Underwriting	Optional
15	Consent to access IP-based location information	Customer KYC and fraud prevention	Mandatory
16	Consent to access camera for uploading required documents	Customer KYC	Mandatory
17	Consent to access microphone for verification or support (if applicable)	Customer KYC and fraud prevention	Mandatory
18	Consent to obtain risk evaluation scores from verification partners	Underwriting	Mandatory
19	Consent to fetch credit information for providing credit-related information services	Credit information services	Mandatory

### 3. PURPOSE OF COLLECTION

#### 3.1

The Company recognises the importance of protecting User Information and ensures that such Information is collected and used only for legitimate, lawful and specified purposes. The Information collected from You through the Website is utilised solely for facilitating the services offered by the Company and for complying with applicable legal and regulatory requirements.

#### 3.2

At different stages of Your interaction with the Website (including registration, application, servicing and closure of services), the Company may collect different categories of Information. The intended purposes for which such Information is collected and processed are summarised below:

## Used For / Purpose

Used For	Purpose
<b>Account Creation and Registration</b>	Personal Information is collected to establish and verify Your identity and to create and manage Your user profile on the Website.
<b>Enabling Services</b>	Information is used to enable and operate the services offered through the Website, including displaying application status, transaction history and other related features.
<b>Customer KYC, Underwriting and Processing</b>	Information collected for KYC, underwriting and processing is used to assess creditworthiness, eligibility, verify identity, validate documents and process applications in accordance with applicable laws.
<b>Loan Servicing and Monitoring</b>	Information is used to track disbursement, repayment, servicing and closure of facilities, and to maintain accurate records.
<b>Customer Support</b>	Information is used to respond to queries, address complaints, provide assistance and resolve grievances raised by Users.
<b>Data Analytics</b>	Information may be analysed to identify trends, improve services, enhance operational efficiency, detect anomalies and strengthen fraud prevention mechanisms.
<b>Communication</b>	Information is used to communicate with You regarding services, transactions, regulatory updates, notices and important information.
<b>Legal and Regulatory Compliance</b>	Information is used to comply with applicable laws, regulations, court orders, audits, regulatory inspections and requests from statutory authorities.
<b>Fraud Prevention and Security</b>	Information is used to detect, prevent and investigate fraudulent, suspicious or unauthorised activities and to safeguard the Company's systems and Users.
<b>Branding and Marketing</b>	Subject to applicable laws and consents, Information may be used to inform Users about products, services, offers and updates.

### 3.3 Additional Clarifications

The Company may disclose Information where required to comply with applicable laws, court orders, regulatory directions or lawful requests from government or enforcement authorities.

Where the Company shares Information with authorised third parties for facilitating services, such parties are permitted to use the Information only for the specified purposes and in accordance with their respective privacy policies and contractual obligations.

## 4. STORAGE OF PERSONAL INFORMATION

**4.1** The Company ensures that all personal Information collected from Users through the Website is stored on secure servers located within India, in compliance with applicable data localisation and regulatory requirements.

**4.2** No personal Information of Users is collected or stored by any unauthorised third party. Any request made by any individual or entity seeking personal Information beyond what is required under this Privacy Policy should be immediately reported to the Company's Grievance Officer.

## 5. DISCLOSURE TO THIRD PARTIES

**5.1** The Company shall share User Information strictly on a need-to-know basis with third parties solely for the purpose of facilitating services, complying with legal obligations and meeting regulatory requirements.

**5.2** The Company may share Information with the following categories of third parties for the purposes set out below:

S. No.	Category of Third Party	Purpose of Disclosure
1	Co-lending or Financial Partners	Customer KYC, underwriting, loan servicing, monitoring, recovery, data analytics, customer communication and regulatory compliance

2	Government or Regulatory Authorities	Compliance with applicable laws, regulations, court orders or lawful requests
3	Debt Collection / Recovery Agencies	Recovery of outstanding dues in accordance with applicable laws
4	Service Providers for Fraud, AML and Analytics	Fraud prevention, anti-money laundering checks and data analysis
5	Aadhaar / KYC Verification Authorities	Identity verification and customer due diligence
6	PAN Verification Agencies	Verification of PAN details
7	Banks and Financial Institutions	Account validation, disbursement, mandate registration and repayment processing
8	Credit Information Companies	Credit assessment and generation of credit reports
9	Account Aggregators	Fetching financial information for underwriting
10	Electronic Signing Service Providers	Execution of loan or service documentation
11	Insurance Providers	Issuance of insurance policies where applicable
12	Telecom Service Providers	Communication through calls or SMS
13	Messaging Platform Providers	Communication through messaging services
14	Email Service Providers	Communication through email

**5.3** All third-party disclosures are governed by confidentiality obligations and contractual agreements which restrict the use of Information strictly to the purposes stated herein.

**5.4** The Company may disclose personal Information to governmental, regulatory, judicial or law enforcement authorities where such disclosure is required under applicable law or



pursuant to valid legal process. By accepting this Privacy Policy, Users consent to such disclosures where legally required.

## **5.5 Conditions Governing Disclosure**

Any disclosure of Information to third parties shall be subject to the following conditions:

**5.5.1** Where disclosure is mandated by law, regulation or court order, the Company may disclose Information without obtaining additional consent, while making reasonable efforts to notify the User where permitted.

**5.5.2** Where required under applicable laws, the Company shall obtain explicit consent prior to sharing Information.

**5.5.3** Information shall be shared strictly on a need-to-know basis and only for specified purposes.

**5.5.4** Additional consents shall be sought at appropriate stages of Information collection, if required under law.

**5.5.5** Use of Information by third parties shall be governed by their respective privacy policies, and Users are encouraged to review such policies.

## **6. DATA RETENTION AND DELETION**

**6.1** The Company retains personal Information in compliance with applicable laws and regulatory requirements. Information is retained to provide uninterrupted services, contact Users when required, manage accounts, and detect, prevent or investigate fraudulent or unlawful activities.

**6.2** Any Information retained by the Company shall be subject to the User's right to withdraw or deny consent, except where such retention is required under applicable laws or is necessary for the continuation or closure of services availed by the User.

**6.3** Personal Information shall not be retained beyond the period necessary for the purposes stated herein, unless retention is required under applicable law.

## **7. CHANGES TO THIS PRIVACY POLICY**

**7.1** The Company reserves the right to amend, modify, add or remove portions of this Privacy Policy at any time. Any changes made shall be published on the Website and shall become effective immediately upon publication, unless stated otherwise. Users are encouraged to periodically review this Privacy Policy to stay informed about the Company's data protection practices. Continued access to or use of the Website or services following such changes shall constitute acceptance of the revised Privacy Policy.

## **8. SECURITY PRECAUTIONS**

**8.1** The Company is committed to safeguarding User Information and maintaining its accuracy. Reasonable physical, administrative and technical security measures are implemented to protect Information against unauthorised access, use, alteration or disclosure. Information transmitted in electronic form is protected using appropriate encryption standards.

**8.2** The Company maintains robust security practices to prevent loss, misuse or unauthorised modification of Information under its control. Secure Socket Layer (SSL) based encryption is used for transmission of Information, in accordance with applicable legal requirements in India.

**8.3** The Company ensures that any third-party service providers engaged by it comply with applicable cybersecurity, data protection and information security standards as prescribed under law and regulatory guidelines, including those issued by the Reserve Bank of India and other competent authorities.

**8.4** In the event of any data security incident or breach, the Company undertakes prompt action to contain, investigate and remediate the incident. Such incidents are reported to the appropriate authorities, including CERT-In, within prescribed timelines, and affected Users are notified where required. Corrective measures are implemented to prevent recurrence.

**8.5** The Company integrates security controls across multiple layers of its systems and processes, leveraging industry-standard technologies to protect Information from common and advanced security threats.

**8.6** The Company undertakes continuous measures to prevent unauthorised access, alteration, disclosure or destruction of Information, including:

- 8.6.1** Encryption of Information during transmission;
- 8.6.2** Use of authentication mechanisms such as OTP-based verification;
- 8.6.3** Periodic review of data collection, storage and processing practices;
- 8.6.4** Restriction of access to Information strictly on a need-to-know basis, subject to confidentiality obligations;
- 8.6.5** Compliance with applicable laws and regulatory requirements;
- 8.6.6** Periodic review and update of this Privacy Policy;
- 8.6.7** Non-disclosure of Aadhaar numbers in any form.

**8.7** The Website may contain integrations, redirections or application programming interfaces (APIs) of registered third-party service providers that collect Information on behalf of the Company. Such Information is stored on secure servers, and the Company ensures that these service providers implement adequate security controls to protect personal Information against loss, misuse or unauthorised alteration in accordance with applicable laws.

**8.8** Third-party service providers engaged by the Company follow strict segregation of environments and duties, with documented, role-based access controls granted strictly on an authorised and need-to-use basis. Stored Information is protected using application-level encryption and controlled key-management systems.

**8.9** Hosting and infrastructure service providers engaged by the Company deploy industry-standard security mechanisms, including anti-virus solutions, anti-malware tools, intrusion detection and prevention systems, file integrity monitoring and application control solutions to safeguard Information.

**8.10** The Company does not permit unauthorised access to Users' non-public personal contacts or financial transaction-related communications by any third party in relation to services provided through the Website.

**8.11** The Website may contain links to external websites operated by third parties. The Company is not responsible for the privacy practices, content or security standards of such third-party websites. This Privacy Policy governs only the collection, use and disclosure of Information by the Company through its Website.

## **9. CONSENT**

**9.1** By accessing or using the Website and submitting Information, You expressly consent to the collection, processing, storage and use of such Information for the purposes specified under this Privacy Policy.

**9.2** In addition to this Privacy Policy, Users are advised to review the privacy policies and terms and conditions of any third-party service providers whose services may be accessed through the Website.

## **10. YOUR RIGHTS**

### **10.1 Modification or Rectification of Information**

If any Information provided by You is inaccurate, incomplete or outdated, You have the right to update or correct such Information by providing accurate and supporting details. The Company encourages Users to ensure that Information shared is true and complete to avoid disruption in services. Where required, supporting documents may be sought for verification before updating records.

For the purposes of the Digital Personal Data Protection Act, 2023, the User shall be deemed the 'Data Principal' and the Company shall be the 'Data Fiduciary'.

### **10.2 Privacy Controls Available to You**

You have certain choices regarding how Information is collected and used, including:



**10.2.1** Managing permissions through browser or device settings to limit access to certain Information, subject to the functionality of the Website;

**10.2.2** Requesting removal or restriction of certain Information stored on the Company's servers, in accordance with this Privacy Policy and applicable laws.

### **10.3 Withdrawal or Denial of Consent**

**10.3.1** You acknowledge that Information has been collected with Your consent. You may choose not to provide certain Information, deny consent for specific processing activities, restrict disclosure to third parties, or revoke previously granted consent, subject to legal and contractual obligations.

**10.3.2** Withdrawal or denial of consent may result in the Company being unable to provide certain services, particularly where such Information is mandatory for compliance or service delivery.

**10.3.3** Requests for withdrawal of consent or deletion of Information will be addressed only after completion or closure of any ongoing services or obligations. Unless otherwise required under applicable laws, Information shall be deleted or anonymised within the prescribed timelines following closure.

**10.3.4** Notwithstanding the above, the Company may retain Information where required to meet regulatory, audit or legal requirements.

### **10.4 Reporting Issues or Concerns**

You have the right to report any suspected security incident, misuse of Information or unauthorised access by promptly informing the Company's designated Grievance Redressal Officer. Upon receipt of such complaint, the Company shall take appropriate steps to investigate and address the issue in accordance with applicable laws.

### **10.5 Right to Nominate**

You may nominate an individual who, in the event of Your death or incapacity, shall be entitled to exercise Your rights under this Privacy Policy in accordance with applicable laws.

### **10.6 Impact of Withdrawal of Consent**

Notwithstanding anything contained herein, certain consequences may arise upon withdrawal of consent, including but not limited to:

**10.6.1** Withdrawal of consent for marketing communications may be effected by submitting a request to the Company through the contact details provided below;

**10.6.2** Requests for deletion of Information may not be implemented during the pendency of any active service, facility or contractual obligation.



## 11. PROHIBITED ACTIONS

### 11.1

While accessing or using the Website, You agree not to engage in any activity that is unlawful, unauthorised or harmful, including but not limited to the following:

- 11.1.1 Restricting or inhibiting other Users from accessing the Website;
- 11.1.2 Using the Website for illegal purposes;
- 11.1.3 Collecting Information of other Users without consent;
- 11.1.4 Framing, mirroring or reproducing any part of the Website without prior authorisation;
- 11.1.5 Engaging in spamming or flooding activities;
- 11.1.6 Transmitting viruses, malware or harmful code;
- 11.1.7 Removing or altering proprietary notices;
- 11.1.8 Using automated tools to extract or mine data;
- 11.1.9 Allowing unauthorised access to the Website using Your credentials.

### 11.2 Contact and Grievance Redressal

For any information, clarification or queries relating to this Privacy Policy, You may contact the Company at the details provided below.

In case You have any grievance or concern relating to the collection, receipt, possession, storage, handling or use of personal Information, You may contact the Company's designated **Grievance Redressal Officer**:

**Name:** Aayushman Singh

**Email:** grievance@chhotariasecurities.com

**Chhotaria Securities Private Limited**

SO-11, 3rd Floor, Magneto the Mall, Telibandha, Raipur (CG) 492001 - Corporate Office

**Grievances shall be acknowledged within 24 hours and resolved within 15 (fifteen) days, or such other period as prescribed under applicable law.**

**Chhotaria Securities Pvt Ltd**  
  
**Director**