

SMFG India Home Finance Company (SMHFC)

Privacy Policy

This document is solely for internal use. No part of it may be circulated, quoted, or reproduced for distribution outside the organization, without prior written approval from SMFG India Home Finance Company Limited.

Abbreviations

LSP	Lending Service Provider
KYC	Know Your Customer
PCI DSS	Payment Card Industry Data Security Standard
ROC	Risk Oversight Committee
DPC	Data Privacy Committee
UIDAI	Unique Identification Authority of India
PID	Personal Identity Data

Background & Coverage

As per prevailing laws and regulations, the body corporate or any person who on behalf of body corporate collects, receives, possesses, stores, deals or handle information of provider of information, should establish and provide a Privacy Policy for handling of or dealing in Personal Information (defined below) including personal data and ensure that the privacy policy is available to such providers of information who has provided the Personal Information under a lawful contract. Such privacy policy should be published on website of the body corporate.

At SMFG India Home Finance Company Limited (hereinafter referred to as "SMFG India Home Finance" / "we"/ "our" / "us", which term shall include its successors), we are strongly committed to protect the personal and financial information of providers of information, including but not restricted to sensitive information, Personal Information and financial information that provider of information submits and would endeavour to protect it from unauthorized use.

All persons ("Covered Person"), whose Personal Information is either collected/ received/ possessed/ stored/ dealt in/ handled by SMFG India Home Finance, who visit SMFG India Home Finance's website <https://www.grihashakti.com> or SMFG India Home Finance's mobile application(s) or digital platforms, and/or whose information is provided to SMFG India Home Finance via offline or online modes, are covered under this Policy.

This Privacy Policy describes the type of information of Covered Persons collected by SMFG India Home Finance, use of such information and purposes for processing of the information.

SMFG India Home Finance is committed to collect and process the Personal Information of the Covered Persons in adherence of this policy while complying with the requirements of applicable laws, rules and regulations governing data protection and privacy.

Personal Information

Any information that relates to a Covered Person, which, either directly or indirectly, in combination with other information available or likely to be available with SMFG India Home Finance, is capable of

identifying such person (such as, but not limited to, name, address, email address, PAN number, user name, precise location, employment details, telephone number, age, date of birth, sensitive information such as information relation to health of a person). Such Covered Person will be the data principal under relevant applicable laws

Consent

By accessing or using SMFG India Home Finance's website/mobile application/digital platforms (if any) or by availing any product or service from SMFG India Home Finance or providing its information to SMFG India Home Finance, Covered Person will agree and consent to the terms of this Privacy Policy, and collection, storage, disclosure and processing of Covered Person's information or data for the purposes of:- (a) availing loans or third-party products facilitated by SMFG India Home Finance, (b) verification, due diligence, fraud prevention, risk assessment, (c) purpose associated with Covered Person's employment, engagement or association with SMFG India Home Finance (as applicable), (d) storage of information or data as per SMFG India Home Finance's policy in addition to any legal or regulatory requirements, reporting to law enforcement agencies/courts, and <e> communications relating to marketing and business promotion. SMFG India Home Finance may also process the Covered Person's Personal Information for any other purpose for which consent is separately and specifically sought from the Covered Person at the relevant time, or as otherwise permitted under applicable law.

Collection of Information

In the course of using the website/mobile application/digital platforms of SMFG India Home Finance or availing the products and services vide the online application forms and questionnaires, SMFG India Home Finance may become privy to the Personal Information of Covered Person, including information that is confidential in nature. Such information may include, but not be limited to: Name, date of birth, demographic details, Aadhaar Number, financial details, family details, banking relationships etc.

SMFG India Home Finance may also collect information in hardcopy through loan applications and supporting documents.

The supporting documents will be collected as per Know Your Customer (KYC) guidelines issued by Reserve Bank of India and may include other documents like statement of accounts, financial statements etc. for the underwriting purpose. Some of these documents and the information extracted from the documents may be stored electronically within the ambit of prevailing regulations.

SMFG India Home Finance, in conformity with the applicable laws and regulations, will maintain requisite due diligence, oversight and accountability in respect of the technical capabilities, robustness of data privacy policies and storage systems, fairness of conduct and past records of its service providers providing services in relation to acquisition, underwriting, pricing, loan servicing, loan recovery, portfolio performance monitoring and/or any other suite of functions associated with the products or services offered by SMFG India Home Finance.

SMFG India Home Finance shall adopt and practice data minimisation approach to enable that only necessary Personal Information of the Covered Person is collected, stored and retained within the ambit of prevailing regulatory guidelines.

SMFG India Home Finance shall use small bits of data called "cookies" stored on user's computers to enable a continuous connection experience for the users. Cookies enable to store information about

user's preferences, IP address, and specific access information which allow said user to access and move to different pages of its secure website without having to re-enter password information. Any information collected is stored in secured databases protected by a variety of access controls and is treated as confidential information by SMFG India Home Finance.

Covered Person should be careful with usage of the username and password by maintaining confidentiality and ensure that Covered Person do not knowingly or accidentally share, provide and facilitate unauthorized use of it.

All Personal Information so provided will be on an 'as is' basis and SMFG India Home Finance shall not be responsible for the accuracy of the Personal Information provided by the Covered Person.

Use & Disclosure of Personal & Financial Information

SMFG India Home Finance will use Covered Person's Personal Information / data in the following circumstances (non-exhaustive):

- i. To perform its contractual obligations, which is about to enter into or have entered into with Covered Person or to enforce its rights under such contract.
- ii. It is necessary for the legitimate interest of SMFG India Home Finance, and/or in the interest of Covered Person, or to comply with legal, statutory, judicial, governmental or regulatory obligations and requirements.
- iii. Compliance with any judgment or order of any court, tribunal or authority, or for responding to a medical emergency involving a threat to the life or health of Covered Person or any other individual.
- iv. For fraud screening and prevention purposes and to protect SMFG India Home Finance's legal rights and comply with SMFG India Home Finance's legal obligations.
- v. For record keeping purposes, to comply with laws and regulations, and to comply with other legal processes and law enforcement requirements.
- vi. To track Covered Person's activity on our digital platforms and thereby to personalize and improve Covered Person's experience on digital platforms.
- vii. For profiling purposes to enable SMFG India Home Finance to personalize and/or tailor any marketing communications that Covered Person may consent to receive.
- viii. To perform activities such as data analysis, audits, usage trends to determine the effectiveness of SMFG India Home Finance's campaigns and as input into improving products and services.

SMFG India Home Finance may use and share within the ambit of regulations the Personal Information collected from the Covered Person to improve its services to Covered Person and to keep the Covered Person updated about its new product offerings or any other information that may be of interest to the Covered Person. SMFG India Home Finance may also invite Covered Person to participate in market research and surveys and other similar activities.

SMFG India Home Finance shall not disclose Personal Information of Covered Persons to its group entities, affiliates or any third party for marketing purposes unless the Covered Person has specifically consented to such use or disclosure.

Generally, SMFG India Home Finance relies on consent as a legal basis for processing Covered Person's Personal Information / data, by itself or through its third-party service providers, partners, agencies or associates, including in relation to sending third party direct marketing communications.

SMFG India Home Finance will comply with applicable laws in respect of storage and transfer of Covered Person's Personal Information / data including any cross-border data transfer requirements i.e. wherein as part of Covered Person's use of our services, Covered Person's Personal Information / data provided to us may be transferred outside India for the purpose of processing and/or storage. Notwithstanding the foregoing, in case of digital lending services, SMFG India Home Finance will ensure that Covered Person's data is stored only in servers located inside international borders of India and in case the data is processed outside India, the same will be deleted from such servers outside India and brought back to India within 24 hours of processing.

Covered Person will have the right to withdraw the consent provided for marketing purposes at any time by contacting SMFG India Home Finance at grihashakti@grihashakti.com. However, SMFG India Home Finance may not be required to obtain Covered Person's consent for use of Covered Person's Personal Information / data to comply with its legitimate legal, statutory or regulatory obligations.

Where SMFG India Home Finance is requested to provide any reference, verification or confirmation relating to a Covered Person to a third party, such disclosure shall be undertaken only with the consent or authorization of the Covered Person unless otherwise required under applicable law.

SMFG India Home Finance will only use Covered Person's Personal Information / data for the purposes for which it was collected, unless SMFG India Home Finance reasonably consider that it needs to use it for compliance of its legal obligations.

The Covered Person can contact SMFG India Home Finance at [Contact Address- Inspire BKC, Unit 504, Level 5, Main Road G Block, BKC, Bandra East, Mumbai – 400051], [Email- grihashakti@grihashakti.com], [Phone- 1800 102 1003] if any explanation required in this regard.

Use of Service Providers

SMFG India Home Finance may use third party services providers to provide services on SMFG India Home Finance's behalf or to facilitate SMFG India Home Finance's products/services or perform any ancillary services in relation to the SMFG India Home Finance's products/services or to assist SMFG India Home Finance to analyse the usage of the product/services and evaluation of service standards.

Transfer of Information

SMFG India Home Finance may share the information with other persons in the course of normal business operations, such as for providing services Covered Person has subscribed for, and any activity related to these services such as collection of fees, basis consent obtained from such Covered Persons. It may become necessary for SMFG India Home Finance to disclose Covered Person's Personal Information to its agents and contractors in the course of normal business operations for the above referred purpose. However, these parties will be required to use the information obtained from SMFG India Home Finance for such purposes exclusively and within the ambit of consent taken from the Covered Person. SMFG India Home Finance will ensure that the third parties receiving any Personal Information, sensitive personal data or information from SMFG India Home Finance or from any person on behalf of SMFG India Home Finance also do not disclose it further. SMFG India Home Finance will also endeavour that these third parties maintain the same level of data protection that is adhered to by SMFG India Home Finance.

SMFG India Home Finance shall ensure that contractual arrangements with service providers, agents and outsourced entities contain appropriate confidentiality obligations, which shall continue to survive the expiry, termination or conclusion of the business relationship or contractual arrangement, to the extent required under applicable laws and contractual commitments.

SMFG India Home Finance will endeavour to take all reasonable steps to ensure that the confidentiality of Covered Person's information is maintained by imposing strict confidentiality standards on all the third parties to whom it discloses such information. SMFG India Home Finance will build-in the necessary covenants for the outsourcing arrangements that are material in nature.

SMFG India Home Finance will transfer or disclose Covered Person's information to a third party only if it is necessary for the performance of a lawful contract between SMFG India Home Finance and the Covered Person as consented by the Covered Person for data transfer or if required to comply with SMFG India Home Finance's obligations under applicable laws.

The Covered Person authorizes SMFG India Home Finance to exchange, share, part with all information related to the details and transaction history of the Covered Person to its affiliates / subsidiaries / banks / financial institutions / credit bureaus / agencies / participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis, credit scoring, verification or risk management and shall not hold SMFG India Home Finance liable for use or disclosure of this information.

SMFG India Home Finance may collect card payments, in compliance with applicable regulations, through a Payment Card Industry Data Security Standard (PCI DSS) compliant partner(s) and the Covered Persons may contact SMFG India Home Finance if an email/SMS confirmation was not received within 48 hours for any payment made through a card swipe.

Data Security

SMFG India Home Finance is strongly committed to protecting the privacy of the Covered Person's Personal Information / data by taking all necessary and reasonable security measures and safeguards as per applicable laws and regulations to protect the confidentiality of the information and its transmission through the world wide web, including implementation of administrative, management and technical safeguards like encryption of data in rest and transit, access control including multi-factor authentication for any privileged access, maintenance of audit trail, fraud detection modules, device and network security checks, periodic system audits, updated and robust information technology infrastructure and physical security and surveillance of facilities and equipment where the information is processed. SMFG India Home Finance's systems continuously monitor for cyber security threats and unusual activities. As part of ongoing control, SMFG India Home Finance will ensure periodic vulnerability assessments and penetration tests, together with implementation of secured development and change management process.

SMFG India Home Finance will limit access to Covered Person's Personal Information to the employees, agents, contractors and other third parties who have a business with SMFG India Home Finance, strictly on a need-to-know basis.

SMFG India Home Finance is committed to upholding data privacy and compliance of data governance requirements to help us deliver quality services to our customers per SMFG India Home Finance's Board approved Information Security framework. SMFG India Home Finance employees and contractors will be required to follow confidentiality obligations and handle Covered Person's information ethically and

securely. SMFG India Home Finance employees undergo training on data privacy, security policies, and best practices to ensure they understand their responsibilities in protecting Personal Information.

SMFG India Home Finance has implemented industry standard security measures for data protection and privacy. Further, SMFG India Home Finance has a robust incident management system and protocols along with a proactive incident response posture. In the event of data breach, SMFG India Home Finance is committed to promptly notifying the affected Covered Persons and the authorities as required under applicable laws and regulations via email and/or other applicable communications methods as well as undertaking necessary remedial actions in compliance to regulatory guidelines.

Fraud prevention and service integrity will be ensured through controls which help detect and prevent fraud, account misuse and/or service abuse and may include, but not limited to, device and network security checks, rate-limiting and anomaly detections. SMFG India Home Finance is committed to maintenance of robust business continuity and disaster recovery mechanisms.

SMFG India Home Finance shall not be held liable for disclosure of the Covered Person's confidential information including Personal Information when such disclosure is required for compliance of applicable laws, rules or regulations, or, in accordance with this Privacy Policy, or, in terms of the agreements/terms agreed, if any, with the Covered Person.

SMFG India Home Finance shall maintain ongoing oversight over material service providers handling Personal Information and may periodically assess their ability to meet applicable confidentiality, security and business continuity requirements.

Data Retention and Erasure/de-identification of data

SMFG India Home Finance shall retain Personal Information for such period as is necessary to fulfil the purpose for which it was collected, or for such longer period as may be required under applicable law (including but not limited to RBI's directions on record retention). Upon the expiry of the retention period, or upon withdrawal of consent by the Covered Person (whichever is earlier), SMFG India Home Finance shall erase and/or de-identify/permanently redact the Personal Information to ensure the information cannot be linked to Covered Person (as per applicable law), within the timelines prescribed under applicable law unless continued retention is mandated by law. SMFG India Home Finance may retain Covered Person's Personal Information / data for extended periods where such information is required for legal, statutory, regulatory, accounting or other legitimate purposes including but not limited to any requirement of any investigation agencies or regulatory or governmental bodies, or arising out of any requirements before judicial/quasi-judicial bodies, or to file/address any customer complaints or legal claims.

SMFG India Home Finance has appropriate policy underlying storage / retention of data, including the length of time for which data can be stored and the restrictions around access or use of data depending on its sensitivity, the data disposal or destruction protocol, the standards of handling data breach, etc. as per regulatory guidelines.

Grievance Officer

SMFG India Home Finance has designated a Grievance Redressal Officer whose details are as follows:-

Name & Designation- Aarti Dhurandhar, Grievance Redressal Officer

Email Address & Contact- GRO@grihashakti.com, 022 – 65483456

Postal Address- Inspire BKC, Unit 504, Level 5, Main Road G Block, BKC, Bandra East, Mumbai – 400051

The Grievance Redressal Officer shall address any grievances or concerns of the Covered Person, including requests for withdrawal of consent by Covered Person and/or exercise of any legitimate rights of Covered Person, expeditiously and in any case within 30 days from the date of receipt of the grievance

Important to Note

- i. Exclusions from Privacy Policy: Third-party/external websites/mobile applications/digital platforms (“External Platforms”) that Covered Person may access via SMFG India Home Finance’s website/mobile application/digital platforms may have different privacy policies and access to such External Platforms will not be subject to this privacy policy. Such External Platforms are not operated by SMFG India Home Finance and are beyond SMFG India Home Finance’s control. SMFG India Home Finance recommends to the Covered Person to read the privacy statement/privacy policy/ privacy commitment of each such External Platforms to find out how they protect Covered Person’s Personal Information / data. SMFG India Home Finance does not accept any responsibility or liability for the policies of, or for any Covered Person’s Personal Information / data that may be collected through, or disclosures made by the Covered Person in any External Platforms. Covered Person’s relationship with these third parties and their services and tools is independent of Covered Person’s relationship with SMFG India Home Finance.
- ii. Amendments: Due to changes in legislation or enhancements to functionality and content on the website/mobile application/digital platforms, SMFG India Home Finance may make changes to its Privacy Policy (without being obliged to do so) and would reflect those changes in this Privacy Policy. Hence Covered Person is obligated to go through this Privacy Policy on a regular basis.
- iii. Prohibited Actions: While using the website/mobile application/digital platforms of SMFG India Home Finance, Covered Person agrees not to, by any means (including hacking, cracking or defacing any portion of the website/mobile application/digital platforms), indulge in illegal or unauthorized activities including the following:
 - Restrict or inhibit any authorized user from using the website/mobile application/digital platforms;
 - Use the website/mobile application/digital platforms for unlawful purposes;
 - Harvest or collect information about website/mobile application/digital platforms users without their express consent;
 - “Frame” or “mirror” any part of the website/mobile application/digital platforms without our prior authorization;
 - Engage in spamming or flooding;
 - Transmit any software or other materials that contain any virus, time bomb, or other harmful or disruptive component;
 - Remove any copyright, trademark or other proprietary rights notices contained in the website/mobile application/digital platforms;
 - Use any device, application or process to retrieve, index, “data mine” or in any way reproduce or circumvent the navigational structure or presentation of the website/mobile application/digital platforms;
 - Permit or help anyone without access to the website/mobile application/digital platforms to use the website/mobile application/digital platforms through its username and password or otherwise;

- Impersonate another person while providing his/her Personal Information for the purpose of accessing the website / mobile application / digital platforms or SMFG India Home Finance's services
- iv. **Aggregate/Anonymized Information:** This Privacy Policy applies only to Personal Information of the Covered Person and does not extend to aggregate, anonymized, de-identified, redacted information, statistical information or data collected and compiled, derived or generated by SMFG India Home Finance during the course of its business operations (provided that such data/information does not whether on its own or in combination with other information identify or enable identification of any Covered Person), which shall continue to constitute SMFG India Home Finance's proprietary information, sole and exclusive property of SMFG India Home Finance and shall not be subject to any deletion, purging or other obligations applicable under this Privacy Policy.
- v. In case the Covered Person avails or uses any facilities/products/services or uses nor accesses SMFG India Home Finance website/mobile application/digital platforms, additional terms and conditions governing such facilities/products/services or the manner of usage of application including collection and disclosure of Personal Information shall be applicable and to be read along with this Privacy Policy.
- vi. SMFG India Home Finance will comply with all guidelines of Personal Information collection, processing, sharing, storage, usage, access and disposal as well as system / device configuration, data encryption including transmission of PID block and the handling of grievances / queries in exercise of data subject rights entailed in the Aadhaar Act 2016 as mandated by UIDAI for the purpose of eKYC authentication by Aadhaar Number / Virtual ID of Aadhaar Number Holders.
- vii. The Covered Person has the right to review the information provided and correct or amend any Personal Information or sensitive personal and financial information if found inaccurate by contacting SMFG India Home Finance at [grihashakti@grihashakti.com].