

**ACHIEVERS FINANCE INDIA LMTD**  
*(formerly known as Achiivers Finance India (P) Ltd)*  
**PRIVACY POLICY**

*(Last Reviewed and Amended in the Board dated 09<sup>th</sup> March 2023)*

Achiivers Finance India LmtD (hereinafter referred as the “**Company**” or “**Achiivers Finance**”) is committed to protecting your (You shall mean “**Client**”, “**Customer**” or “**User**”) personal information and has created this Privacy Policy to provide you with information about its privacy practices. This Privacy Policy guides you how the Company will collect, use, disclose, transfer and store your information collected on the website. The Privacy Policy may be changed at any time upon the sole discretion of the Company and without prior notice to you.

This Privacy Policy has been prepared in compliance with:

1. Information Technology Act, 2000;
2. Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
3. Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021;
4. Guidelines on Digital Lending issued by the Reserve Bank of India (“**RBI**”), 2022;
5. Other applicable acts, regulations and rules which requires publishing of a Privacy Policy for handling of or dealing in personal information including sensitive personal data or information

## **Consent**

By using the website, you are accepting the practices as mentioned in this Policy.

You are hereby expressly given your consent to provide information to the Company, as detailed out in this Policy, for the purpose of providing the lending services to you by partnering with various financial lenders, third parties, service providers etc. based on your requirement to avail such Services (“**Services**”). It is important for you to Read, Understand, Acknowledge and unconditionally agree to be bound by the Terms and Conditions of this Privacy Policy.

If you disagree with any of the terms and conditions mentioned herein, please do not proceed with the usage/ access/ install/ download any content of this website application or any part thereof.

While you give your consent, you also acknowledge that the website may contain links to other websites. If you click on a third-party link, you will be directed to that website. Note that these external sites are not operated by us. Therefore, it is strongly advised that you review the privacy policy of these websites/external links before proceeding. Achiivers Finance has no control over it and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **Collection of Information**

Information collected for facilitation of loans being disbursed to the loan service providers, whose details are available on the website.

### **A. Information Collected by the Company**

#### **Personal Information:**

Personal information includes name, address, contact number, email id, date of birth, gender, family details, business information and other details shared via application form or via email or via any other medium. It can also include information such as user name, account number, password and any other personally identifiable information.

Achiivers Finance will collect all personal information with your explicit consent in a specific consent form. The Company shall not retain or store any personal information except basic minimal information such as name, contact number, email address as provided in the RBI guidelines. Achiivers Finance shall not store any biometric data unless allowed under the extant statutory guidelines. The Company will store all the collected data only in servers, located within India and ensure compliance with statutory obligations and regulatory instructions.

Achiivers Finance will indicate the mandatory and the optional fields against the information requested from you. You always have the option to not provide your personal information by choosing not to use a particular service or feature on the Website.

#### **Device Information:**

The information which will be collected on the Website, depends on how you manage your privacy controls on your device. When you open the Website, the Company may store the information of the unique identifiers after seeking explicit permissions from you to collect the required information from the device.

The information Achiivers Finance may collect from your device includes the unique ID i.e. IMEI number, information on operating system, IP Address, SDK version, Google AD ID {unique user ID provided by Google}, Search Queries and mobile network information including carrier name, SIM Serial and SIM Slot, your profile information, list of installed apps, Wi-Fi information, camera information, album information, microphone information, push notifications etc.

In addition to the above, Achiivers Finance also track and collect the data related to the performance of the web application and other diagnostic data for identifying and resolving any technical glitches that may be identified from such data and also for improving the overall functionality of the application.

Achiivers Finance will collect the information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. From such information, Achiivers Finance will understand the feedback received from the device holders and device behavior to improve the product interaction, quality of services and provides an enhanced customized user experience.

**Information of Installed Applications:**

Achiivers Finance may also collect and transmit a list of specific installed applications' metadata information, such as, application name, package name, installed time, updated time, version name and version code of each installed application on your device. This data may be collected even when the app is closed or not in use. This information can be used for onboarding and Know Your Customer (KYC) purposes of a client with his/her explicit consent.

**Social Account Information:**

Achiivers Finance may provide you an option to register using social accounts, such as Google, Facebook etc. to access the web and shall collect only the registered email id and user public profile information, such as name, address, email id, contact number etc. to log into the application during registration/ sign in process in the Platform for the purpose of verification and to pre-populate the relevant fields on such Platform. However, Achiivers Finance will not store account passwords.

**Location:**

Achiivers Finance may collect location information from your device with your explicit consent by enabling a one- time-access to reduce the risk associated with your account. This information may be used to verify your address for the KYC and onboarding process on the Platform.

**Camera and Microphone Access:**

Achiivers Finance may request for camera and microphone access from your device with your explicit consent by enabling a one- time-access to scan and capture the required KYC documents in accordance with the applicable laws. Such information may be shared with the Lending Service Providers ("LSP") for providing lending services. Your audio shall be recorded for regulatory purposes.

**SMS:**

Achiivers Finance don't collect your personal SMSs from your inbox.

Achiivers Finance may only collect SMS (5-6 digit SMS) from your inbox which helps the Company in identifying the various accounts that you are holding and the cash flow patterns that you have as a user to determine your risk profile and to provide you with the appropriate credit analysis to enable you to take financial facilities from us.

**Storage:**

Achiivers Finance will seek a one-time access from you to get storage information permission to enable the Web Application to upload photos and/or documents to complete the application form, if and as required, during your application journey and the same shall be sent to the lender partners.

Achiivers Finance shall not retain or store any personal information except basic minimal information such as name, contact number, email address as provided under the RBI guidelines. Achiivers Finance shall not store any biometric data unless allowed under the extant statutory guidelines. Achiivers Finance will store all the collected data only in servers, located within India

and ensure compliance with statutory obligations and regulatory instructions. In case, if any representative of the Company ask for biometric data from you, we request you to please refrain from the same and immediately contact the Grievance Redressal Officer of the Company. Please follow our Grievance Redressal Mechanism in this regard.

Achiivers Finance shall also collect such other information as required by the LSP and transfer those information to the LSP upon completion of the preliminary onboarding.

## **B. Information Collected from Third Parties**

### **Credit Report:**

For providing lending services, Achiivers Finance may collect credit information from third parties, such as credit bureaus, credit rating agencies as your authorized representative, from time to time before onboarding and during the tenure of the loan period after obtaining explicit consent from you in accordance with the applicable laws.

In order to facilitate credit products to you, Achiivers Finance may collect certain information relating to document verification or repayment status of earlier loans, GST details from official GSTIN API stack or other relevant websites using the GST Network user id and password details or OTP as provided by you, bank account numbers or UPI payment information on behalf of the LSP to facilitate collection and repayment of loan.

Achiivers Finance shall collect all such information only on a need basis strictly for the purpose of providing loan services.

Achiivers Finance shall not aggregate, retain, store, copy, reproduce, republish, upload, post, transmit, sell or rent the credit information to any other person and the same cannot be copied or reproduced other than as agreed herein. You hereby acknowledge and understand that the lending partners may collect your credit information to assess your creditworthiness, prior to extending any credit facility to you.

## **C. Information provided by you**

Achiivers Finance will collect few data from you with your explicit consent:

1. Data provided by you in the Application Forms or on the Website Application;
2. Data provided to Achiivers Finance through email, chat box, letter, telephone etc.;
3. Data provided at the time of onboarding or registration for using the Website, downloading or subscribe to any services or search for a service on Achiivers Finance's website;
4. Data provided by you for reporting any issues or problem with our website, services or others;
5. Data provided by completing surveys, poll, sweepstakes, contest or promotional scheme.

## **D. Collection of Non-Personal Information:**

### **Cookies:**

Cookies are small data files that a website stores on your device. Achiivers Finance may use "cookies" as required to identify and track the device's usage behavior and compile all the data to improve the services, resolve disputes, provide customer support and troubleshoot problems in compliance with the law and make it more user friendly.

### **Web Beacons:**

The web pages of the website contain electronic images known as “web beacons”, sometimes called single-pixel gifs and are used along with cookies to compile aggregated statistics to analyse how the website is used. Web beacons may also be used in some of our emails so as to know which emails and links recipients have opened, allowing it to gauge the effectiveness of its customer communications and marketing campaigns.

### **Third Party SDK and Other Sites:**

Achiivers Finance may provide a third party SDK link or Application Programming Interface (API) integrations, redirections on its website application to collect data on behalf of the Company. The data will be stored to a secured server to perform a variety of services such as analyzing your in-app actions, serving retargeting ads, sending personalized push notifications, and performing credit assessment based on your information among others.

Achiivers Finance don't allow unauthorized access to your non-public personal contacts or financial transaction SMS data with any third party without your explicit consent. Achiivers Finance also ensure that the third party service providers take extensive security measures in order to protect your personal information against loss, misuse or alteration of the data under the applicable laws.

Achiivers Finance's platform links other websites that may collect information about you. The Company is not responsible for the privacy practices or the content of those linked websites. With this policy, Achiivers Finance is only addressing the disclosure and use of data collected by the Company. Their data collection and retention practices and their policies may differ from Achiivers Finance's policy. The Company do not have control over any of their policies and we have no liability in this regard.

## **Purpose of Collection of Documents**

Achiivers Finance shall use the information on a need basis for the purpose of providing the loan services in the following ways and in compliance with all the applicable laws:

1. To assist the LSPs for providing loans or other value added services;
2. To observe, improve, and administer the quality of services;
3. To analyse how the Platform is used and diagnose technical problems;
4. To make user data analysis and risk management;
5. To establish identity and verify the same;
6. To facilitate KYC as per instructions from the LSPs;
7. To design and offer customized products and services offered by the third parties;
8. To ensure compliance with all legal obligations of the Company, Know-your Customer, Prevention of Money Laundering, CKYC requirements, etc;
9. For fraud prevention and detection;
10. To resolve disputes and detect and protect us against suspicious or illegal activity, fraud and other criminal activity;
11. To send User surveys and marketing communications that Achiivers Finance believes may be of User interest;
12. To analyse, conduct internal reviews, surveys and understand the Users, improve the content and features of the Platform;
13. To send marketing and promotional SMS, email and whatsapp and inform you about online and offline offers, products, services and updates;
14. To notify you about any changes on the Platform;

15. To enable us to send administrative notices and service-related alerts to you;
16. To enable us to do market research, troubleshooting, protection against errors, project planning, fraud and other criminal activity; and
17. To enforce our terms and conditions.

## **Disclosure and Sharing of Information to Third Parties**

Achiivers Finance will disclose the information as described below:

1. Achiivers Finance will disclose and share your information with the financial service providers, banks or NBFCs and our LSPs for facilitation of loan, as required;
2. The Company may disclose your information to enforce the terms and conditions of this Policy;
3. The Company may share the information with other technology partners to understand and track the device behavior on behalf of the Company;
4. Achiivers Finance may share your information with another business entity in case of merger, amalgamation, acquisition, restructuring of business etc., as required though the business entity shall be bound by this Policy;
5. The Company may share the information to third-party technology or third party data source providers after obtaining explicit consent from you;
6. The Company will share the information with the third parties under a Confidentiality Agreement which binds them and restrict use of those information only for the lending services as mentioned herein and there will be no unauthorized disclosure of your information;
7. The Company shall disclose your KYC documents to the relevant regulatory authorities as a part of the statutory audit process. The Company shall also ensure that your Aadhaar number shall never be disclosed;
8. Achiivers Finance will disclose your information to the government authorities, quasi government authorities, judicial authorities and quasi-judicial authorities, if required/ ordered under any law, act, rules, regulations, provisions, decree and the Company shall not seek your explicit consent at that time. However, the Company will intimate you regarding such disclosure.
9. Achiivers Finance shall share your information with third parties only on a need basis and only for the purposes as mentioned in this Policy;
10. Usage of your information by the third parties is subject to their Privacy Policies. Achiivers Finance do not have control over any of their policies and we have no liability in this regard.

By accepting this Privacy Policy, you hereby provide your consent to disclose your personal information for such regulatory requirements.

## **Update User Information**

If any of the information provided by you changes, you may correct, delete inaccuracies, or amend information by providing a letter addressing to Achiivers Finance or sending an email from your registered email id with the updated details to [info@achiiversfinance.com](mailto:info@achiiversfinance.com) . We will update our database within 7 (seven) working days from the date of receipt of the letter or email or will ask for further documents, if required.

Further, Achiivers Finance shall not be responsible for the authenticity of your information including sensitive personal data supplied to us.

## **Data Protection, Retention and Storage**

Achiievers Finance will protect your personal data from unauthorized access, misuse and ensure disclosure of the same as mentioned in this Policy with the proper security measures.

The Company will retain your data to provide you a seamless experience on the Website, to prevent fraud or illegal activities, to resolve any issues or problems relating to the services, products or others related thereto, during the tenure of the loan period.

The Company shall not retain or store any personal information except basic minimal information such as name, contact number, email address as provided under the RBI guidelines. The Company shall not store any biometric data unless allowed under the extant statutory guidelines.

The Company will store all the collected data only in servers, located within India and ensure compliance with the statutory obligations and regulatory instructions.

## **Intellectual Property Rights**

All contents on the Website, including graphics, text, icons, interfaces, audio clips, logos, images, reviews, comments and software is the property of the Company and/or its content suppliers and is protected by Indian and international copyright laws and other applicable intellectual property laws. Any use, including the reproduction, modification, distribution, transmission, republication, display or performance, of the content on this Platform can only be made with the express written permission of Achiievers Finance. All other trademarks, brands and copyrights other than those belonging to Achiievers Finance, belong to their respective owners and are their property. Users shall not modify the paper or digital copies of any materials that are printed off or downloaded in any way on or from the Platform, and Users must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text. **USERS MUST NOT USE ANY PART OF THE CONTENT ON THE PLATFORM FOR COMMERCIAL PURPOSES WITHOUT OBTAINING A WRITTEN CONSENT/LICENCE TO DO SO FROM THE COMPANY OR ITS LICENSORS. IF THE USER PRINTS, COPIES OR DOWNLOADS ANY PART OF THE PLATFORM IN BREACH OF THE TERMS HEREOF, THEIR RIGHT TO USE THE PLATFORM WILL CEASE IMMEDIATELY AND USER SHALL, AT ITS OPTION, RETURN OR DESTROY ANY COPIES OF THE MATERIALS MADE, THEREOF.**

## **Changes to Privacy Policy**

Achiievers Finance reserves the right, at our sole discretion, to update, modify, amend, change, add, delete or replace any part of this Policy at any time for any reason by posting updates and changes to the Platform. It is your responsibility to check the Platform periodically for changes. Once posted, the changes shall be effective immediately. Your continued use of or access to the Platform or the service following the posting of any changes to this Policy constitutes your acceptance of such changes. In case of any material changes to the Policy, the Users may be notified by means of a notice on Platform or through an email to your registered email id prior to the change becoming effective.

## **Foreign Jurisdiction**

Achiivers Finance makes no representation that the content disclosed on the Website is appropriate to use or access from outside India. If the Users use or access such information from outside India, they do so at their own risk and are responsible for compliance with the laws of such jurisdiction.

## **Severability**

Achiivers Finance ensures that this Policy adheres with the applicable laws, rules and regulations. The invalidity or unenforceability of any part of this Policy shall not prejudice or affect the validity or enforceability of the remainder of this Policy.

## **No Waiver**

The rights and remedies available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. It may be waived only in writing. Delay in exercising or non-exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.

## **Security Precautions**

Achiivers Finance shall adhere to strict security measures to protect and secure your information from unauthorized access. Some of the safeguards we use are firewalls and bit data encryption using SSL, and information access authorization controls. We use reasonable safeguards to preserve the integrity and security of your information against loss, theft, unauthorized access, disclosure, reproduction, use or amendment. To achieve the same, we use reasonable security practices and procedures as mandated under applicable laws for the protection of your information. For example, we encrypt all information when we transmit over the internet. We also require that our registered third party service providers protect such information from unauthorized access, use and disclosure and follow such standards as mandated under applicable laws.

Achiivers Finance shall follow the guidelines as mentioned below to secure your information:

1. Achiivers Finance shall use encryption while transmitting data;
2. Achiivers Finance shall offer security feature like OTP verification to help you to protect your account;
3. The Company shall periodically review Privacy Policy including information collection, retention, storage and security clauses and amend it accordingly, if required;
4. The Company shall restrict access of your information to our employees, contractors, agents and other third parties who need the information to provide services. Anyone possessing such information shall strictly adhere to the confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
5. The Company shall also ensure that your Aadhaar Number should not be disclosed in any manner;

6. Achiivers Finance shall strictly follow the relevant act, rules and regulation and comply accordingly.

This Policy does not apply to any information other than information collected by us through the Platform. This Policy will not apply to any unsolicited information provided by you through the Website or through any other means this includes, but is not limited to, information posted on any public areas of the Platform. All such unsolicited information shall be deemed to be non-confidential and we will be free to use, disclose such unsolicited information without limitation.

## Your Rights

1. **To rectify/ modify data:** If any personal information provided by you is inaccurate, incomplete, outdated then you shall have the right to rectify or modify such data by giving us a written notice to the Registered Address of the Company or to our email id [info@achiiversfinance.com](mailto:info@achiiversfinance.com). You are requested to provide us updated data always during the tenure of the loan period. You are also requested to provide us supporting documents in case of change of any information provided by you for the purpose of verification by the Company.

2. **To allow any particular services:** Achiivers Finance shall give you an option to enable any particular service for your device. For example, permission has been obtained from you for accessing your camera, microphone, storage etc. You can modify permissions on your device to grant or remove any permission at a later stage.

However, if any permission has been removed by you, Achiivers Finance cannot provide guarantee of uninterrupted seamless services.

3. **To withdraw/ denial of consent:** You shall have the right to deny consent for use of specific data, restrict disclosure to third parties, data retention, and revoke consent already granted. However, if any permission has been removed by you, Achiivers Finance cannot provide guarantee of uninterrupted seamless services.

You may also withdraw your consent to contact you, for the continued collection, use or disclosure of your information, at any time, or request for deletion of your account by raising a request by a letter to our Registered Office address or mailing us at [info@achiiversfinance.com](mailto:info@achiiversfinance.com).

However, if you have availed any loan facilities from LSP, they shall have the right to continue processing your information till such credit facility has been repaid in full, along with any interest and dues payable and/or for such period as may be allowed under applicable laws, rules and regulations. However, Achiivers Finance shall not retain your data and information if it is no longer required by us and there is no legal requirement to retain the same. Do note that multiple legal bases may exist in parallel, and we may still have to retain certain data and information at any time.

4. **To Report an Issue:** You have a right to report a security incident to the Grievance Redressal Officer in writing. You are entitled to prevent unauthorised usage of your information by our personnel/agents by informing us through a letter or an email from your registered email id, within 10 (ten) days of being informed of the proposed use, that

you do not wish to disclose such information. You can also exercise the right at any time by contacting us at [info@achieversfinance.com](mailto:info@achieversfinance.com).

### **Grievance Redressal Officer**

In accordance with the relevant provisions of the Information Technology Act, 2000 and Rules made thereunder, the Company has designated the Grievance Officer. Users can contact the Grievance Redressal Officer with respect to any complaints or concerns regarding the handling, storage, disclosure of User Information.

Please follow our Grievance Redressal Mechanism Policy in this regard.