



### Privacy Commitment

Fiscal Fellows take privacy of its customers, or any other person visiting or using any office, branch, website, portal, application or other platform provided by Fiscal Fellows or communicating with us over telephone, WhatsApp, face-to-face or any other method or availing the products and services physically or vide the online application forms and questionnaires (hereinafter referred to as “User/you/your”) very seriously and are committed to protect your personal data. This Privacy Commitment sets out the way in which we collect, use, disclose, transfer, and store your personal data.

You are advised to carefully read the Privacy Commitment before using this or any other platform, application or channels or communicating with us or sharing information/data. Fiscal Fellows will not be liable / responsible for any breach of privacy owing to User’s negligence.

Please note that our application and other digital platforms may contain links to third party applications / digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own digital platforms. We recommend that you check the privacy and security policies and procedures of each and every other application / digital platform that you visit.

#### 1. WHAT DATA DO WE COLLECT FROM YOU AND WHAT DO WE USE IT FOR?

- A. Personal data is data that can be used to identify or contact a single person (such as name, address, e-mail address, PAN Number, user name, location, employment details, telephone number, age, date of birth, gender and other KYC data you submit to our application, sensitive information such as information relating to your health life).
- B. All personal data that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this Privacy Commitment. We may supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organizations, for example, our sponsors and partners.
- C. We may collect such personal data through telephonic conversations with any employees or representatives of Fiscal Fellows or any of its customer service agents and/or any other mode of communication or submitted by you vide documents, images or in any other form and whether in the physical or digital/online mode. You agree that any such communication whether written or oral may be recorded to comply with Fiscal Fellows’ internal processes or any applicable law.
- D. To facilitate onboarding procedures for particular services, we may need access to your device's SMS features. Certain applications may occasionally collect transactional SMS data, which would include sender names, SMS content, and received timestamps, and share it with third parties. This information is used to examine your spending and financial patterns, which helps with credit evaluations and may lead to speedier approval processes and greater credit limits. It is important to note that we do not access or analyze personal messages.
- E. In order to assess for fraud, if any, and to better understand your risk profile, we may, through certain applications, periodically gather metadata information about the apps that are installed on your mobile device. This information includes the name of the application, package name, installed time, updated time, version name, and version code of each installed application. We may also gather information about how you use applications like VPNs and gaming apps. A link on our platform directs to an approved third-party



SDK that gathers data on our behalf and stores it on a secure server for analysis. Application-level encryption safeguards and protects the data that has been stored.

- F. You represent to us that you are above the age of 18 and are in contracting capacity to access our platform and share your personal data with us.
- G. Please note, if you don't choose to provide us with the requested personal data, we will be unable to offer you our products or services.

In broad terms, we use your personal data for the following purposes:

- a. to administer and provide products and services you request or have expressed an interest in;
  - b. to communicate with you in the event that any products or services you have requested are unavailable;
  - c. for fraud screening and prevention purposes and to protect Fiscal Fellows' legal rights and comply with Fiscal Fellows' legal obligations;
  - d. for record keeping purposes, to comply with laws and regulations, and to comply with other legal processes and law enforcement requirements;
  - e. to carry out market research so that we can improve the products and services we offer;
  - f. to track your activity on our digital platforms;
  - g. to create an individual profile for you so that we can understand and respect your preferences;
  - h. to personalize and improve your experience on our digital platforms and allow you to utilize digital platforms' features by granting Fiscal Fellows access to information from your device;
  - i. to personalize and/ tailor any communications that we may send you;
  - j. for profiling purposes to enable us to personalize and/or tailor any marketing communications that you may consent to receive from us;
  - k. to inform you about important details like Fiscal Fellows' digital platforms, change in terms, conditions and policies and /or other administrative information important to meet your interests;
  - l. to address your requests and queries and manage your relationship with Fiscal Fellows;
  - m. to access your eligibility for our products or services and provide you with such products or services which you may have shown interest in or requested for;
  - n. to perform activities such as data analysis, audits, usage trends to determine the effectiveness of Fiscal Fellows' campaigns and as input into improving products and services;
  - o. for security and business continuity and risk management;
  - p. for system or product development and planning, audit and administrative purposes;
  - q. to meet the legitimate interests to be pursued by Fiscal Fellows or by a third party.
- H. When you sign up with us for an online account, register to receive marketing communications from us, fill in one of our forms (whether online or offline), contact us or otherwise expressly provide us with your personal data, we may collect and store any personal data that you provide to us and may use it to personalize and improve your experience on our digital platforms, provide products and services you request from us, and carry out profiling and market research.
- I. We may also infer your country of location from the IP address you have used to access our digital platforms and we may analyze which marketing activity led to your taking specific action on our digital platforms (e.g. downloading the app).

## 2. OFFERS AND OPPORTUNITIES FROM US AND OUR PARTNERS



We want you to be the first to know about new products and services, and occasional offers from our partners. We may share these offers with you only with your prior consent. You can unsubscribe from receiving these offers by emailing us. Please note, if you don't choose to receive this information, we will be unable to keep you informed of new services, products, events or special offers that may interest you.

### 3. WHY DO WE PROCESS YOUR INFORMATION?

- A. We may process your personal data for legitimate interests, including providing you with services and for service improvement purposes.
- B. It may be deemed necessary to process personal data for the following purposes of legitimate interests by us such as:
  - i. To deliver services in respect to requests raised by you.
  - ii. To ensure continued relationship with our customers, partners or suppliers.
  - iii. To prevent misuse or fraudulent activities on our platforms.
  - iv. To uphold performance of contracts with us.
  - v. Protecting our interests.
  - vi. To maintain compliance with legal obligations.
- C. Fiscal Fellows takes special consideration to ensure that the legitimate processing of data do not override the fundamental rights and freedoms of the User.

### 4. WHOM DO WE SHARE YOUR PERSONAL DATA WITH?

- A. Under certain conditions Fiscal Fellows may share your information with third parties including but not limited to its group companies, vendors, service providers, data processors, banks, financial institutions, credit bureaus, telecommunication companies, statutory bodies etc. for customer verification, personalization of products and services, credit rating, data enrichment, marketing or promotion of the products or services of Fiscal Fellows or of any other service provider. Fiscal Fellows may use the personal data to improve its services to you and to keep you updated about its new products or other information that may be of interest to you.
- B. Fiscal Fellows may share information in the course of normal business operations, such as providing services you have subscribed for, and any activity related to these services such as collection of fees. It may become necessary for Fiscal Fellows to disclose your personal data to its agents and contractors in the course of normal business operations for the above referred purpose. However, these parties would be required to use the information obtained from Fiscal Fellows for such purposes exclusively. Fiscal Fellows will endeavor to take all reasonable steps to ensure that the confidentiality of your information is maintained by third parties to whom it discloses such information. Fiscal Fellows may be required to disclose your personal data to the statutory authorities in connection with any legal process that may be initiated by such authorities in accordance with applicable laws.
- C. Fiscal Fellows may occasionally invite selected third parties to participate in offers we feel would be attractive to customers of Fiscal Fellows. Fiscal Fellows may also share your information to provide you with superior services and a range of offers. Fiscal Fellows may use this information to advise you of products, services and other marketing materials, which we think, may be of interest to you. Fiscal Fellows may also invite visitors to this site to participate in market research and surveys and other similar activities. Fiscal



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Fellows reserve the right to communicate your personal information to any third party that makes a legally compliant request for disclosure.

### 5. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

- A. You are responsible for providing Fiscal Fellows with accurate and complete personal data. Please notify us of any changes to your personal data. Fiscal Fellows shall take reasonable steps to ensure that your personal data is kept accurate, complete, and current.
- B. Fiscal Fellows shall not retain such Information longer than permissible. Such information however may be retained for a longer period where we need the information for legal, regulatory, accounting or other legitimate purposes which may include but not be limited to filing/ addressing complaints, responding to any queries raised by any of our regulators/ customers/ governmental bodies, any legal claims etc. To determine the appropriate retention period for personal data, Fiscal Fellows considers the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which it processes your personal data and whether it can achieve those purposes through other means, and the applicable legal requirements. In some circumstances Fiscal Fellows may anonymize your personal data so that it can no longer be associated with you and use such information.