

5TH DECEMBER 2023



PRIVACY POLICY

InPrime – Privacy Policy

Version Control:

Version #	Date	Addition/Modification	Made By	Approved by	Approval date
1	5-Dec-2023	Privacy Policy		Board of Directors	5-Dec-2023

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Introduction:

InPrime Finserv (STK Credit Private Limited) is committed to transparent and responsible lending practices. The privacy policy is in compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information), Rules 2011 (the “IT Rules”) framed under Information Technology Act 2000 (“IT Act”).

Definitions

In this privacy policy, unless the context otherwise requires, following expressions shall have the meanings as assigned to them below:

- “Information” shall have the meaning as assigned to it under [clause (v) of sub-section (1) of section 2][1] of the IT Act or as may be amended from time to time;
- “Personal Information” shall have the meaning as assigned to it under [sub-clause (i) of clause (1) of Rule 2][2] of the IT Rules or as may be amended from time to time;
- “Sensitive personal data or information” shall mean and include the information prescribed under [Rule 3][3] of the IT Rules or as may be amended from time to time;

Confidentiality of Personal Information

STK Credit Private Limited preserves the confidentiality of all information provided, by adhering to the following principles:

- STK Credit Private Limited collects the Personal Information that it is required to be collected as per the regulatory guidelines and what is relevant for the conduct of business.
- STK Credit Private Limited will not disclose Personal Information to any external organization without the consent of the customer, unless required by statutory laws and regulations, or required to be disclosed to Governmental or judicial bodies or quasi-government or agencies or regulators from time to time under proper authority.
- STK Credit Private Limited has put in place reasonable security practices and procedures designed to prevent unauthorized access to the personal information by anyone, including its own staff as per IT Rules.
- STK Credit Private Limited, its staff and any agent or third-party service provider does not have access to customer information and in the event of being directed to access such information, they shall observe their confidentiality obligations.
- Relevant Sections & Definitions of the Act
- [1]Section 2(1)(v): “information” includes data, text, images, sound, voice, codes, computer programmes, software and databases or micro film or computer generated micro fiche
- [2]Rule2(1)(i):“Personal information” means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.
- [3]. Sensitive personal data or information.— Sensitive personal data or information of a person means such personal information which consists of information relating to;— (i) password; (ii) financial information such as Bank account or credit card or debit card or other payment instrument details ; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) Biometric information; (vii) any detail relating to the above clauses as provided to body corporate for providing service; and (viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: provided that, any information that is freely

available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

Collection of Personal Information

STK Credit Private Limited will collect information pertaining to identity, demographics, and related evidentiary documentation.

STK Credit Private Limited collects personal information for a variety of regulatory and business purposes. These include, but are not limited to:

- Verify identity of its users / customers.
- Complete transactions effectively and bill for products and services.
- Respond to the request for service or assistance.
- Provide, maintain and improve STK Credit Private Limited products and services.
- Anticipate and resolve issues and concerns with STK Credit Private Limited products and services.
- Ensure adherence to legal and regulatory requirements for prevention and detection of frauds and crimes.

Personal information collected and held by STK Credit Private Limited may include name, father's name, mother's name, spouse's name, date of birth, current and previous addresses, telephone number, mobile phone number, email address, and information contained in the documents used as proof of identity and proof of address such as Aadhaar, PAN , Voters ID, Driving License etc as required for the conduct of its business.

STK Credit Private Limited collects, stores and processes following types of sensitive personal information such as password, financial information and physiological information for providing products, services and use of website.

STK Credit Private Limited may keep a log of the activities performed by the customers/users on STK Credit Private Limited network and websites by using various internet techniques such as web cookies, server log files, etc., for analytical purposes and for analysis of the amiability of various features of STK Credit Private Limited Website.

This information may be used to provide a better experience at STK Credit Private Limited portal and for evidentiary purposes. At any time while surfing STK Credit Private Limited website, if customers do not wish to share surfing information, they may opt out of receiving the cookies from STK Credit Private Limited web site by making appropriate changes to their browser privacy settings.

Security Practices & Procedures

- STK Credit Private Limited adopts reasonable security practices and procedures, to include technical, operational, managerial and physical security controls in order to protect all Information from unauthorized access, or disclosure while it is under STK Credit Private Limited control.
- STK Credit Private Limited's security practices and procedures limit access to Information on a directed-only basis. Further, STK Credit Private Limited employees are bound by Code of Conduct which obligates them to protect the confidentiality of personal information.

- Necessary steps are taken to ensure that STK Credit Private Limited's third parties adopt reasonable level of security practices and procedures to ensure security of the Information.
- STK Credit Private Limited may retain the Information so collected as long as required to provide customers/users with its services or if otherwise required under any law for the time being in force.
- While disposing of the Information, STK Credit Private Limited uses reasonable procedures to erase it or render it unreadable (for example, shredding documents and wiping electronic media). Internet use – STK Credit Private Limited maintains the security of internet connections, however for reasons outside the control of STK Credit Private Limited, security risks may still arise. Any personal information transmitted to STK Credit Private Limited will therefore be customer risk. However, STK Credit Private Limited will strive to ensure the security of customer information. STK Credit Private Limited observes reasonable security measures to protect the personal information against hacking and virus dissemination.

Confidentiality of Personal Information

STK Credit Private Limited is committed to safeguard all Information, collected and handled by STK Credit Private Limited. In case of any feedback or concern regarding protection of such Information, customers/users can contact STK Credit Private Limited through Email Alternatively, customers may also direct privacy-related feedback or concerns to the Grievance Officer **Mr. Harsha Vardhan whose details are as mentioned below: Email: harsha@inprime.in**

Review & Revision

This will be periodically reviewed and, if necessary, update it as per the relevant regulation or business requirements
