

SMFG India Home Finance Co. Ltd.
(Formerly Fullerton India Home Finance Co. Ltd.)

Privacy Policy

Policy Title		Privacy Policy
Policy Owner	Compliance	
Original Issue Date	December 2015	
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Policy Version	V1. 2021	
Functional aspects checked by External consultant	Vinod Kothari and Co.	
Approved By	Board of Directors	
Regulatory Guidelines/ Notifications/ Circulars	The Information Technology Act, 2000 and The Information Technology (Reasonable Security Practices & Procedures & Sensitive Personal Data or Information) Rules 2011	

Recommended By

Signing Authority	Designation	Date	Signature
Rakesh Makkar	Chief Executive Officer & Whole-time Director		

Reviewed By

Signing Authority	Designation	Date	Signature
Nitin Nimbalkar	Chief Information Security		
Ram Kolli	Head - Sales & Distribution		

Prepared By

Signing Authority	Designation	Date	Signature
Seema Sarda	Compliance Officer		

INDEX

S. No.	Particular	Page
1	Background	3
2	Definitions	3
3	Collection of Information	3
4	Use of Personal Information	4
5	Transfer of Information	4
6	Data Security	5
7	Data Retention	6
8	General	6
9	Review of the Policy	7

1. **Background**

Section 43A of the Information Technology Act, 2000 read with Rule 4 of the Information Technology (Reasonable Security Practices & Procedures & Sensitive Personal Data or Information) Rules 2011¹, requires body corporate to provide policy for privacy and disclosure of information if any. The body corporate or any person who on behalf of body corporate collects, receives, possess, stores, deals or handle information of provider of information, should provide privacy policy for handling of or dealing in personal information including sensitive personal data or information and ensure that the same are available for view by such providers of information who has provided such information under lawful contract. Such policy should be published on website of the body corporate.

At SMFG India Home Finance Co. Ltd. (*Formerly Fullerton India Home Finance Co. Ltd.*) (hereinafter referred to as “SMFG Grihashakti” which term shall include its successors) we are strongly committed to protect the Personal information, including but not restricted to, Sensitive Personal and Financial Information that customer submits to us and we would endeavor to protect it from unauthorized use.

2. **Definitions**

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.

Sensitive Personal and Financial Information: means such personal information that is otherwise not available to anyone except the customer, such as password, financial information, sexual orientation, medical records, biometric information, physical, physiological and mental health condition. Such information is generally not available in public domain.

3. **Collection of Information**

In the course of using the website of SMFG Grihashakti India or availing the products and services vide the online application forms and questionnaires, SMFG Grihashakti may become privy to the personal information of its customers, including information that is confidential in nature.

Such information may include, but not be limited to the following: Name, date of birth, demographic details, financial details, family details, banking relationships etc.

¹ [http://meity.gov.in/sites/upload_files/dit/files/GSR313E_10511\(1\).pdf](http://meity.gov.in/sites/upload_files/dit/files/GSR313E_10511(1).pdf)

SMFG Grihashakti also collects information in hardcopy through loan applications and supporting documents. The supporting documents are collected as per Know Your Customer (KYC) guidelines issued by Reserve Bank of India and Nation Housing Bank and other documents like statement of accounts, financial statements etc. for the underwriting purpose. Some of these documents and the information extracted from the documents are also stored in the electronic form. SMFG Grihashakti would also collect information to deliver, promote or market SMFG India Credit's products or services in connection with an existing or potential business or employment relationship with you.

Cookies: SMFG Grihashakti will use small bits of data called "cookies" stored on user's computers to stimulate a continuous connection. "Cookies", enable to store information about customer preferences, IP address, and passwords and allow customer to 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 Grihashakti.

4. Use of Personal Information

SMFG Grihashakti will use your personal data in the following circumstances:

- a. We need to perform the contract we are about to enter into or have entered into with you.
- b. It is necessary for our legitimate interest and your interest and fundamental rights do not override those rights
- c. We need to comply with legal, statutory or regulatory obligations

SMFG Grihashakti may use the personal information collected to improve its services to customer and to keep the customer updated about its new product offerings or any other information that may be of interest to the customer.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw the consent to marketing at any time by contacting SMFG Grihashakti at namaste@grihashakti.com.

We will only use your personal information data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation on the purpose, please contact us.

5. Transfer of Information:

SMFG Grihashakti may share this information with individuals and body corporate in the course of normal business operations, such as providing services customer has subscribed for, and any activity related to these services such as collection of fee. It may become necessary for SMFG Grihashakti to disclose customer's personal information 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 SMFG Grihashakti for such purposes exclusively. SMFG Grihashakti would ensure that the third parties receiving any sensitive personal data or information from body corporate or any person on SMFG Grihashakti's behalf also do not disclose it further. SMFG Grihashakti would also endeavor that these third parties maintain the same level of data protection that is adhered to by it.

SMFG Grihashakti will endeavor to take all reasonable steps to ensure that the confidentiality of customer information is maintained by imposing strict confidentiality standards on all the third parties to whom it discloses such information. SMFG Grihashakti would build-in the necessary covenants for the outsourcing arrangements that are material in nature.

SMFG Grihashakti would transfer customer's information only if it is necessary for the performance of a lawful contract between itself and the customer as consented by the customer for data transfer.

The customer authorizes SMFG Grihashakti Limited to exchange, share, part with all information related to the details and transaction history of the customers 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 and credit scoring, verification or risk management and shall not hold SMFG Grihashakti liable for use or disclosure of this information.

SMFG Grihashakti may collect card payments through a PCI DSS compliant partner and the customers may contact SMFG Grihashakti if an email/SMS confirmation was not received within 48 hours for any payment made through a card swipe.

6. Data Security

SMFG Grihashakti is strongly committed to protecting the privacy of its customers and has taken all necessary and reasonable measures to protect the confidentiality of the customer information and its transmission through the world wide web and it shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Commitment or in terms of the agreements, if any, with the customer.

We will limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

You are responsible for maintaining the security of your account credentials and other authentication involved in obtaining access to password-protected or secure areas. SMFG Grihashakti will not bear any liability in respect of such unauthorized use of your account.

7. **Data Retention:**

We retain the information for as long as necessary to fulfill the purposes for which you have provided the information, including for the purpose of satisfying any legal, accounting or reporting obligations and similar essential purposes. To determine the appropriate retention period, we consider the nature and sensitivity of the personal data and the purpose.

You have the right to review the information provided and correct or amend any personal information or sensitive personal information if found inaccurate.

We have appointed a Grievance Officer to redress the grievances or provide information in relation to this privacy policy expeditiously, but within one month from the date of receipt of such grievance.

Designation: Compliance Officer

Email address: privacy@grihashakti.com Postal address: SMFG Grihashakti, 6th floor, Supreme Business Park, Supreme City, Powai, Mumbai - 400 076

8. **General**

Exclusions from Privacy Policy: Other websites that customer may access via SMFG Grihashakti website may have different privacy policies and access to such web sites will not be subject to this privacy policy. SMFG Grihashakti recommends that customer to read the privacy statement of each such website to find out how they protect customer personal information.

Amendments: Due to changes in legislation or enhancements to functionality and content on the website, SMFG Grihashakti may make changes to privacy policy (without being obliged to do so) and would reflect those changes in this privacy policy statement. Hence customers are requested to go through the privacy policy statement on a regular basis.

Non-Binding: Please note that this privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

Prohibited Actions: While using the website of SMFG Grihashakti, customer agrees not to, by any means (including hacking, cracking or defacing any portion of the Site) indulge in illegal or unauthorized activities including the following:

- Restrict or inhibit any authorized user from using this Site.
- Use the Site for unlawful purposes.
- Harvest or collect information about Site users without their express consent.
- "Frame" or "mirror" any part of the Site 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 Site.
- 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 Site.
- Permit or help anyone without access to the Site to use the Site through your username and password or otherwise.

9. **Review of the Policy**

The Policy should be subjected to an annual review by the management and modifications, if any warranted, should be taken up for the approval of the Board. If there are any amendments in the regulations, revision in the policy should be staged for Board's approval in the immediately ensuing Board Meeting, after the amendments are notified by the regulator.