

**(Last amended by the board on 06<sup>th</sup> November, 2019)**

# Online Privacy Policy

We Manappuram Finance Limited (hereinafter mentioned as "MAFIL") are committed to protect our customers' personal information and/or sensitive personal data and strive to maintain the privacy of your personal information.

For your information, "Personal information" is any information that can be used by itself to uniquely identify, contact, or locate a person, or can be used with information available from other sources to uniquely identify an individual. For the purpose of this policy, sensitive personal data or information has been considered as a part of personal information.

MAFIL does collect your personal information for a variety of regulatory and business purposes. These include, but are not limited to:

- Verify your identity
- Complete transactions of products and services
- Respond to your request for service or assistance
- Perform market analysis, market research, business and operational analysis
- Provide, maintain and improve our products and services
- Anticipate and resolve issues and concerns with our products and services
- Promote and market our products and services which we consider may be of interest to you and may benefit you; and
- Ensure adherence to legal and regulatory requirements for prevention and detection of frauds and crimes.

MAFIL's Privacy Policy is designed and developed to address the privacy and security of your personal information provided to us. This Privacy Policy describes the personal information which we may collect and provides our approach towards handling or dealing with the same.

The policy is designed to make you understand:

- kinds of personal information that may be collected by us
- measures taken by us to ensure its privacy and security
- duration for which when it may be retained by us; and
- how you may access and control its use

## **COLLECTION OF PERSONAL INFORMATION**

MAFIL and its authorized third parties will collect information pertaining to your identity, demographics, and related evidentiary documentation. For the purposes of this document, a 'Third Party' is a Service Provider who associates with MAFIL and is involved in handling, managing, storing, processing, protecting and transmitting information of MAFIL.

This definition also includes all Sub-Contractors, Consultants and/or representatives of the Third party.

We may also collect your personal information when you use our services or websites or otherwise interact with us during the course of our relationship.

- Personal information collected and held by us may include your name, father's name, mother's name, spouse's name, date of birth, current and previous addresses, telephone number, mobile phone number, email address, occupation and information contained in the documents used as proof of identity and proof of address. MAFIL and its authorized third parties collect, store, process following types of Sensitive Personal Information such as password, financial information (details of Bank account, credit card, debit card, or other payment instrument details), biometric information, physiological information for providing our products, services and for use of our website. We may also hold information related to your utilization of our services which may include your call details, your browsing history on our website, location details and additional information provided by you while using our services.
- MAFIL Digital Personal Loan App may collect information with your consent from your mobile device like device location, device information (including storage, model, installed apps, Wi-Fi, mobile network) transactional and promotional SMS, communication information including contacts to provide customized offerings

We may keep a log of the activities performed by you on our network and websites by using various internet techniques such as web cookies, web beacons, server log files, etc. for analytical purposes and for analysis of the amiability of various features on our site. This information may be used to provide you with a better experience at our portal along with evidentiary purposes. At any time while you are surfing our site, if you do not wish to share surfing information, you may opt out of receiving the cookies from our site by making appropriate changes to your browser privacy settings.

In case you do not provide your information or consent for usage of personal information or later on withdraw your consent for usage of the personal information so collected, MAFIL reserves the right to not provide the services or to withdraw the services for which the said information was sought.

### **COOKIES**

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On some of our web sites, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our web sites' features.

### **LOCATION-BASED TOOLS**

MAFIL may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services

which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

### **WEB BEACONS**

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. MAFIL only uses web beacons in accordance with applicable laws.

MAFIL or its service providers may use web beacons to track the effectiveness of third party web sites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded.

In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

### **SOCIAL MEDIA WIDGETS AND APPLICATIONS**

MAFIL web sites may include functionality to enable sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of MAFIL web sites (see details on 'Social Sharing' cookies above). Any personal information that you provide via such social media applications may be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, MAFIL web sites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any MAFIL social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

### **LINKS TO OTHER SITES**

Please be aware that MAFIL web sites may contain links to other sites, including sites maintained by other MAFIL member firms that are not governed by this Privacy Statement but by other privacy statements that may differ somewhat. We encourage users to review the privacy policy of each website visited before disclosing any personal information.

Where a link to a non- MAFIL site(s) exists, which, has not been authorized by MAFIL, MAFIL will not be responsible or liable in any way for the content of the linked website including any products, services or other items offered through that website.

## **DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION**

**Internal Use:** As explained in the section “Collection of Personal Information” MAFIL and its employees may utilize some or all available personal information for internal assessments, measures, operations and related activities.

**Authorized Third Parties:** MAFIL may at its discretion employ, contract or include third parties (as defined in section 1: Collection of personal information) external to itself for strategic, tactical and operational purposes. Such agencies though external to MAFIL, will always be entities which are covered by contractual agreements. These agreements in turn include MAFIL’s guidelines to the management, treatment and secrecy of personal information.

We may transfer your personal information or other information collected, stored, processed by us to any other entity or organization located in India only in case it is necessary for providing services to you or if you have consented (at the time of collection of information) to the same. This may also include sharing of aggregated information with them in order for them to understand our environment and consequently, provide you with better services. While sharing your personal information with third parties, adequate measures shall be taken to ensure that reasonable security practices are followed at the third party.

We may obtain your consent for sharing your personal information in several ways, such as in writing, online, through "click-through" agreements; orally, including through interactive voice response; or when your consent is part of the terms and conditions pursuant to which we provide you service. We, however assure you that MAFIL does not disclose your personal information to unaffiliated third parties (parties outside MAFIL corporate network and its Strategic and Business Partners) which could lead to invasion of your privacy.

**Government Agencies:** We may also share your personal information with Government agencies or other authorized law enforcement agencies (LEAs) mandated under law to obtain such information for the purpose of verification of identity or for prevention, detection, investigation including but not limited to cyber incidents, prosecution, and punishment of offences.

If you wish to opt out of receiving product or service related communication from us, reach out through mail to [crm@manappuram.com](mailto:crm@manappuram.com)

## **SECURITY PRACTICES AND PROCEDURES**

We adopt reasonable security practices and procedures, in line with international standard IS/ISO/IEC 27001, to include, technical, operational, managerial and physical security controls in order to protect your personal information from unauthorized access, or disclosure while it is under our control.

Our security practices and procedures limit access to personal information on need-only basis. Further, our employees are bound by Confidentiality Policies which obligate them to protect the confidentiality of personal information.

We take adequate steps to ensure that our third parties adopt reasonable level of security practices and procedures to ensure security of personal information.

We may retain your personal information for as long as required to provide you with services or if otherwise required under any law.

When we dispose of your personal information, we use reasonable procedures to erase it or render it unreadable (for example, shredding documents and wiping electronic media).

**Internet Use** - We maintain the security of our internet connections, however for reasons outside of our control, security risks may still arise. Any personal information transmitted to us or from our online products or services will therefore be your own risk. However, we will strive to ensure the security of your information. We observe reasonable security measures to protect your personal information against hacking and virus dissemination.

### **UPDATE OF PERSONAL INFORMATION**

We strive to keep our records updated with your latest information. To this end, if you see any discrepancy in your personal information or if a part of your personal information changes, we request you to reach our customer service at our customer care 18004202233 or write to us at [crm@manappuram.com](mailto:crm@manappuram.com) and communicate the change(s) for updating our records.

In case of non-compliance with the terms and conditions and privacy policy, MAFIL reserves the right to remove your non-compliant information from its systems. Further, depending on the seriousness of the non-compliance, we may choose to discontinue some or all of the services being provided to you by us.

### **FEEDBACK AND CONCERNS**

We are committed to safeguard your personal information collected and handled by us and look forward to your continued support for the same. In case of any feedback or concern regarding protection of your personal information, you can contact us at [crm@manappuram.com](mailto:crm@manappuram.com). Alternatively, you may also direct your privacy-related feedback or concerns to the Privacy Grievance Officer whose details are as mentioned below:

Name	: Mrs. Vijayalakshmi. M.S.
Contact Number	: 9946729999
E-mail	: <a href="mailto:crm@manappuram.com">crm@manappuram.com</a>
Working Days	: Monday to Friday
Working Hours	: 8:30 am to 5:30 pm

We will strive to address your feedback and concerns in a timely and effective manner.

### **CHANGES TO THIS STATEMENT**

MAFIL may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "updated" date at the top of this page. We encourage you to periodically review this Privacy Statement to be informed about how MAFIL is protecting your information.