MANAPPURAM FINANCE LTD (MAFIL)

DATA PRIVACY POLICY

Version Control		
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Prepared by	:	**Risk Department**
Reviewed by	:	**Policy Review Committee**
Approved by	:	**CMD - MAFIL**

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Manappuram Finance Limited (MAFIL) collects, uses, stores, shares, and protects the personal data of its customers in connection with loan and financial services offered through its website (www.manappuram.com), mobile applications, or any other digital or physical channels (collectively referred to as "Platform"). The Policy reflects compliance with the Reserve Bank of India (RBI) regulations, Information Technology Act, 2000, and the Digital Personal Data Protection (DPDP)Act, 2023.

1. PURPOSE AND SCOPE

This Policy applies to all individuals ("Data Principals") whose personal data is collected, processed, or retained by Manappuram Finance Limited (MAFIL) while availing any loan, product, or service. It outlines our privacy commitments, your rights, and our responsibilities as a Data Fiduciary under applicable law. This Privacy Policy shall be read in conjunction with the Information Security (IS) Policy, Customer Onboarding Policy, Vendor Onboarding Policy, Data Retention and Disposal Policy, IT Usage Policy, and other applicable internal governance documents.

2. DEFINITIONS

2.1. Data Principal

An individual whose personal data is collected, processed, or stored by Manappuram Finance Limited (MAFIL). In this context, it refers to customers or users of MAFIL's services.

2.2. Data Fiduciary

An entity or organization that determines the purpose and means of processing personal data. MAFIL acts as the Data Fiduciary under the Digital Personal Data Protection (DPDP) Act, 2023.

2.3. Data Protection Officer (DPO)

An officer designated by MAFIL responsible for overseeing data protection compliance, handling data-related grievances, and communicating with authorities.

2.4. Anonymization

A process of removing personal identifiers from data so that individuals cannot be identified directly or indirectly.

2.5. CERT-In (Computer Emergency Response Team – India)

A national agency under the Ministry of Electronics and IT responsible for managing cybersecurity incidents and responses in India.

3. TYPES OF PERSONAL DATA COLLECTED

MAFIL collect only such personal data that is necessary for lawful business purposes and regulatory compliance, including:

- Identity and profile data (name, gender, date of birth, photo, marital status, etc.)
- Contact details (address, email, phone number, PIN code, etc.)
- KYC and verification data (Aadhaar, PAN, voter ID, Driving License, Job Card issued by NREGA etc.)
- Financial and transactional data (bank account, income, credit details, repayment history, etc.)
- Device and technical data (IP address, location, device ID, OS, etc.)
- Communication and marketing preferences
- Other documents required for processing loan applications or regulatory reporting

4. LAWFUL BASIS AND PURPOSE OF PROCESSING

MAFIL processes the personal data of customer based on consent and legal obligations under applicable laws. The purposes include:

- Loan application, processing, and servicing
- Customer verification (KYC, CIBIL checks, employment verification, etc.)
- Credit reporting and compliance with statutory requirements
- Customer communication and grievance handling
- Fraud detection, information security, and risk management • Marketing and service enhancement (only with consent)

5. CONSENT AND WITHDRAWAL

MAFIL obtains the consent of the customer before collecting or processing his personal data. Customers can withdraw their consent anytime by contacting the Data Protection Officer (DPO) of MAFIL. Withdrawal of consent shall limit MAFIL's ability to provide or continue certain services. Such consent withdrawal will not affect processing done prior to withdrawal.

6. DATA SHARING AND THIRD PARTIES

MAFIL may share the personal data of its customers with third-party service providers, regulated lending partners, and statutory bodies for lawful purposes. Each third party should operate under a Data Processing Agreement ensuring confidentiality and security. The categories include:

- Digital KYC and e-sign partners
- Credit bureaus and reporting agencies (e.g., CIBIL)
- Payment and e-NACH service providers
- Cloud and IT service providers
- Collection and communication partners

A detailed list of vendors is maintained under para 15 of this policy, and shall be updated periodically on MAFIL's website.

7. DATA RETENTION AND DESTRUCTION

MAFIL shall retain the data only so long as required by law or for legitimate business purposes. KYC records are retained for five years post cessation of relationship as per PMLA (Prevention of Money Laundering Act, 2002). Upon completion of the retention period, data is securely deleted or anonymized in accordance with MAFIL's internal retention schedule and regulatory guidelines.

8. DATA SECURITY

MAFIL shall implement comprehensive technical and organizational measures consistent with ISO/IEC 27001 standards and RBI cybersecurity guidelines, including:

- Encryption of data at rest and in transit (TLS 1.2+, AES 256)
- Multi-factor authentication and access control
- Regular VAPT and security audits
- Continuous SOC monitoring and incident management
- Role-based access and least-privilege principle

9. DATA BREACH MANAGEMENT

MAFIL shall report any suspected or confirmed personal data breach promptly to the DPO and Chief Information Security Officer (CISO).

Within 24 hours of detection, the incident shall be verified and contained by DPO/CISO. DPO/CISO shall issue notification to affected customers, to CERT-In, and to RBI as per regulatory requirements within 48 hours from detection.

MAFIL shall notify the Data Protection Board of India once RBI or Government of India specifies such reporting obligations.

MAFIL shall maintain a register and document all breaches and remedial actions are implemented to prevent recurrence in a data breach register.

10. DATA PRINCIPAL RIGHTS

Customers shall have the following rights under applicable law:

- Right to access and confirm processing of their data
- Right to correction, completion, and updating
- Right to erasure (subject to regulatory retention)
- Right to withdraw consent
- Right to grievance redressal

Customer shall submit the requests to the DPO. Acknowledgement for the requests shall be made by the DPO within 7 working days and resolve the concern within 30 days.

11. COOKIES AND DIGITAL TRACKING

MAFIL shall use Cookies and similar technologies to improve user experience. Customer can manage cookie preferences in their browser settings. Customers can not disable essential cookies as they are required for secure operations.

12. CHILDREN'S DATA

MAFIL will not knowingly collect or process personal data of minors (individuals below 18 years). If such data is inadvertently collected, it will be deleted immediately upon discovery.

13. COMPLIANCE AND ACCOUNTABILITY

MAFIL shall maintain audit trials, periodic reviews, and internal privacy governance programs to ensure compliance with RBI and DPDP Act requirements. MAFIL's Employees and vendors are bound by confidentiality and data protection obligations.

14. CHANGES TO THIS POLICY

This Policy may be reviewed periodically to reflect regulatory or operational updates. Updates will be published on our website, and continued use of our services implies acknowledgment of such changes.

15. CONTACT DETAILS – DATA PROTECTION OFFICER

For any queries or to exercise your data rights, please contact:
Name: Mr. Sajith C, Data Protection Officer
Address: Manappuram Finance Limited, Manappuram House, Valapad, Thrissur, Kerala – 680567
Email: dpo@manappuram.com
Phone: 0487-3050238 / Toll-free: 1800 420 2233
Working Hours: 8:30 AM to 5:30 PM (Monday to Saturday)

16. LIST OF KEY VENDORS / SERVICE PROVIDERS

1. Digiotech Solutions Private Limited – E-Sign Services
2. Bharti Airtel Limited – Customer Messaging
3. TransUnion CIBIL Limited – Credit Bureau Reporting
4. Experian Credit Information Company of India pvt. Ltd
5. Crif Highmark Credit Information Services pvt. Ltd
6. Equifax Credit Information services pvt. Ltd
7. Lotus Pay Solutions Private Limited – e-NACH Setup
8. ACL Mobile Limited – WhatsApp Messaging
9. Vipatra Technologies Pvt. Ltd. – Collection Services
10. Corrz Techno Solutions Pvt. Ltd. – Voice Bot Services
11. Gamut Analytics – AI-based Collection Bot
12. Armsoft-Tech – Collection Voice Bot
13. Signzy Technologies Pvt. Ltd. – API Integration / KYC
14. Gupshup Technology India Pvt. Ltd. – SMS Services
15. Hyper Verge technologies Pvt. Ltd
16. Jukshio Technology Innovation Pvt. Ltd

17. Quagga tech private ltd
18. Protean e-Gov Technologies Limited

The list of vendors mentioned above is indicative and not exhaustive. It is subject to periodic review and may be updated based on the onboarding of new vendors or changes in business requirements.

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