By mere access to the Platform or any part thereof, you expressly consent to Bornbrave Technologies Private Limited ("we" or "our"or "us" or "Bornbrave") use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the Terms of Use of the Platform.

If you do not agree to this Policy or any part thereof, please do not use or access our Platform or any part there of.

# 1. Collection of Personally Identifiable Information

- 1.1. When you use our Platform, whether our Website or our App, we collect and store your information which is provided by you from time to time. Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience and services. This allows us to provide services and features that meets your needs, and to customize our Platform to make your experience safer and easier and to improve the services provided by us. More importantly, we collect personal information from you that we consider necessary for achieving the aforementioned purpose.
- 1.2. In general, you can browse the Website or App without telling us who you are or revealing any personal information about yourself. However, to create an account on the Website or App, you must provide us with certain basic information required to provide customized services. The information we collect from you, inter alia, including: (i) your full name, (ii)email, (iii) mailing address, (iv) postal code, (v) family details, (vi)university / college details, (vii) phone number, (viii) permanent account number (PAN), and (ix) academic records and certificates.
- 1.3. Where possible, we indicate the mandatory and the optional fields. You always have the option to not provide your personal information by choosing not to use a particular service or feature on the Platform.
- 1.4. We also collect other identifiable information (your payment card details and transaction histories on the Platform) from you when you set up a free account with us. While you can browse some sections of our Platform without being a registered member as mentioned above, certain activities (such as availing of loans from the third-party lenders on the Platform) requires registration and for you to provide the above details. The Platform shall clearly display the personal information it is collecting from you, and you have the option to not provide such personal information. However, this will limit the services provided to you on the Platform.

## 2. Collection of Other Non-Personal Information

- 2.1. We automatically track certain information about you based upon your behavior on our Platform. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve our users and improve our services. This information is compiled and analyzed on an aggregated basis. We also collect your Internet Protocol (IP) address and the URL used by you to connect your computer to the internet, etc. This information may include the URL that you just came from (whether this URL is on our Website or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, and your IP address.
- 2.2. Cookies are small data files that a Website stores on Your computer. We will use cookies on our Website similar to other lending websites/apps and online marketplace websites / apps. Use of this information helps Us identify You in order to make our Website more user friendly. Most browsers will permit You to decline cookies but if You choose to do this it might affect service on some parts of Our Website.
- 2.3. If you choose to make a purchase through the Website, we collect information about your buying behavior.
- 2.4. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

2.5. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Website, we collect such information into a file specific to you.

## 3. Collection of Device Information

- 3.1. The information the App collects, and how that information is used, depends on how you manage your privacy controls on your device.
- 3.2. When you install the App, we store the information we collect with unique identifiers tied to the device you're using.
- 3.3. We collect information from the device when you download and install the App and explicitly seek permissions from YOU to get the required information from the device.
- 3.4. The information we collect from your device includes the unique ID.
- 3.5. We collect information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behavior, thereby allowing us to improve our services and provide an enhanced customized user experience to you.
- 3.6. The key information collected from the device is further detailed below. Note that depending on your version of app, some or all of these may be applicable.
- 3.7. SMS
- 3.7.1. We don't collect your personal SMSs from your inbox.
- 3.7.2. We only collect financial SMS (5-6 digit Financial SMS) from your inbox which helps us in identifying the various accounts that you are holding and the cash flow patterns that you have as a user to help us determine your risk profile and to provide you with the appropriate credit analysis to enable you to take financial facilities from the regulated financial entities and other service providers available on the Platform.
- 3.7.3. While using the App, it periodically sends the financial SMS information to our servers.
- 3.7.4. This is applicable only if you are using older versions of the App.The current version of the App does not collect this data.
- 3.8. Location
- 3.8.1. We collection location information from your device to reduce the risk associated with your account.
- 3.9. Contacts
- 3.9.1. As a part of our loan journey, we require references from the Loan applicant. In this regard, during filing the form on our Website, we collect your contact information to detect close contacts to enable you to autofill the data during the loan application process.
- 3.9.2. Furthermore, we collect contact information from your device for the purposes of risk analysis by enabling us to detect credible references. The more credible the references are, the lower is the risk associated to a User.
- 3.10. Storage
- 3.10.1. We require the storage information permission to enable the App to enable you to upload photos and/or documents to complete the application form during your loan application journey.
- 3.11. Camera

3.11.1. We require the camera information permission to provide you an easy/smooth experience and to enable you to click photos of your KYC documents along with other requisite documents and upload the same on the App during your loan application journey.

# 4. Use and Disclosure of your Personal and Other Information

- 4.1. We use personal information to provide the services you request, to customize your user experience and to improve our services. To the extent we intent to use your personal information to market any product to you, we will provide you the ability to opt-out of such uses.
- 4.2. We use your personal information to: (i) resolve disputes, (ii) troubleshoot problems, (iii) help promote a safe service, (iv) analytical analysis, (v) measure consumer interest and satisfaction in our products and services, (vi) inform you about online and offline offers, products, services, and updates, (vii) customize your experience, (viii) detect and protect us against suspicious or illegal activity, fraud and other criminal activity, (ix) enforce our terms and conditions, (x) improvement of our services and as otherwise described to you at the time of collection.
- 4.3. In our efforts to continually improve our product and service offerings, we collect and analyze demographic and profile data about our users' activity on our Website.

# 5. Use of your Device Information

- 5.1. We use the information provided by You in the following ways: (i) to establish identity and verify the same, (ii) monitor, improve and administer our Website / Platform, (iii) provide our service i.e. perform credit profiling for the purpose of facilitating loans to You, (iv) design and offer customized products and services offered by our third-party financial partners, (v) analyze how the Website is used, diagnose service or technical problems and maintain security, (vi) send communications notifications, information regarding the products or services requested by You or process queries and applications that You have made on the Website, (vii) manage Our relationship with You and inform You about other products or services We think You might find of some use, (viii) conduct data analysis in order to improve the Services / Products provided to the User, (ix) use the User information in order to comply with country laws and regulations, (x) to conduct KYC for our third-party lending partners based on the information shared by the User, (xi) use the User information in other ways permitted by law to enable You to take financial services from our lending partners.
- 5.2. We will use and retain Your information for such periods as necessary to provide You the Services on our Website, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

### 6. Disclosure to Third Parties:

6.1. We will share Your information with third parties including our regulated financial partners for provision of services on the Website and/or for facilitation of a loan / facility to a User. We will share Your information with third-parties only in such manner as described below: (i) we disclose and share Your information with the financial service providers, banks or NBFCs and Our third-party partners for facilitation of a loan or facility or line of credit or purchase of a product, (ii) we share Your information with our third-party partners in order to conduct data analysis in order to serve You better and provide services or Products on our Website, (iii) we may disclose Your information, without prior notice, if We are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property,

#### 6. Disclosure to Third Parties:

6.1. We will share Your information with third parties including our regulated financial partners for provision of services on the Website and/or for facilitation of a loan / facility to a User. We will share Your information with third-parties only in such manner as described below: (i) we disclose and share Your information with the financial service providers, banks or NBFCs and Our third-party partners for facilitation of a loan or facility or

line of credit or purchase of a product, (ii) we share Your information with our third-party partners in order to conduct data analysis in order to serve You better and provide services or Products on our Website, (iii) we may disclose Your information, without prior notice, if We are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of Us, Our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction, (iv) we may disclose Your information, without prior notice, if We are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of Us, Our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction, (v) we will disclose the data / information provided by a User with other technology partners to track how the User interact with Website on Our behalf, (vi) we and our affiliates may share Your information with another business entity should we (or our assets) merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. Should such a transaction occur than any business entity (or the new combined entity) receiving any such information from Us shall be bound by this Policy with respect to your information, (vii) we will disclose the information to our third-party technology and credit partners to perform credit checks and credit analysis like Credit Bureaus or third-party data source providers, (viii) we will disclose Your information under a confidentiality agreement with the third parties and restrict the use of the said Information by third-parties only for the purposes detailed herein above.

6.2. In case we use or disclose You information for any purpose not specified above, we will take your explicit consent.

# 7. Your Privacy Controls

7.1. You have certain choices regarding the information we collect and how it is used: (i) device-level settings: Your device may have controls that determine what information we collect, (ii) delete your entire App account, (iii) you can also request to remove content from our servers based on applicable law or by writing to our Grievance Officer.

#### 8. Security Precautions

- 8.1. The Website/App is built with strict security features that continuously protect your information.
- 8.2. Our Platform has stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavor to safeguard and ensure the security of the information provided by you. We use Secure Sockets Layers (SSL) based encryption, for the transmission of the information, which is currently the required level of encryption in India as per the law.
- 8.3. We work hard to protect from unauthorized access, alteration, disclosure or destruction of information we hold, including: (i) we use encryption to keep your data private while in transit, (ii) we offer security feature like an OTP verification to help you protect your account, (iii) we review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems, (iv) we restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations, (v) compliance & cooperation with regulations and applicable laws, (vi) we regularly review this Privacy Policy and make sure that we process your information in ways that comply with it, (vii) data transfers.
- 8.4. We maintain your information on servers located in India. Data protection laws vary among countries, with some providing more protection than others. We also comply with certain legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000.

- 8.5. When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.
- 8.6. We will enquire with one or more Credit Bureaus on one or more National Banking Financial Company\*s (NBFC) behalf to provide you with your loan amount

# 9. Choice / Opt-Out

- 9.1. We provide all users with the opportunity to opt-out of receiving non-essential (promotional, marketing-related) communications from us on behalf of our partners, and from us in general, after setting up an account.
- 9.2. If you want to remove your contact information from all Website lists and newsletters, please visit unsubscribe.

### 10. Links to Other Sites

10.1. Our Website links to other websites that may collect personally identifiable information about you. We are not responsible for the privacy practices or the content of those linked websites. With this Policy we're only addressing the disclosure and use of data collected by Us. If You visit any websites through the links on the Website, please ensure You go through the privacy policies of each of those websites. Their data collection practices and their policies might be different from this Policy and We do not have control over any of their policies neither do we have any liability in this regard.

#### 11. Advertisements on the Website

11.1. We use third-party advertising companies to serve ads when you visit our Website. These companies may use information (not including your name, address, email address, or telephone number) about your visits to our Website and other websites in order to provide advertisements about goods and services of interest to you.

## 12. Your Consent

- 12.1. By using the Website/App and/ or by providing your information, you consent to the collection and use of the information you disclose on the Website in accordance with this Privacy Policy, including but not limited to Your consent for collecting, using, sharing and disclosing your information as per this privacy policy.
- 12.2. If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.