PRIVACY & DATA STORAGE POLICY

Company	Ajivika Finance Limited (AFL), RBI-registered NBFC (CIN: U74120UP1986PLC115939 | RBI CoR No.: B-12.00476)
Digital Lending Platform	Jivikaloan (www.jivikaloan.com) and the Jivikaloan mobile application
Applicable Laws	Information Technology Act, 2000; Digital Personal Data Protection Act, 2023 and Rules; RBI directions on KYC, Digital Lending and IT governance
Policy Owner	Grievance Officer, with Compliance as custodian
Approving Authority	Board of Directors
Effective Date	1st October 2026

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INTRODUCTION

Jivikaloan is a digital lending platform owned by **Ajivika Finance Limited** ("AFL", "Jivikaloan", the "Company", "we", "our" or "us"), a company incorporated under the Companies Act, 2013 (CIN: U74120UP1986PLC115939), with its registered office at B-84, Second Floor, B Block, Sector 64, Noida, Uttar Pradesh – 201301. AFL is a Non-Banking Financial Company registered with the Reserve Bank of India (RBI CoR No. B-12.00476). All loans are sanctioned, processed and disbursed by AFL, and loan approval is subject to creditworthiness assessment, income verification and applicable RBI regulations.

This Privacy & Data Storage Policy (the "Policy") is an electronic record under the Information Technology Act, 2000 and the rules made under it. It explains how we collect, use, share, store and protect your personal data. For the purposes of the Digital Personal Data Protection Act, 2023 (the "DPDP Act"), AFL is the Data Fiduciary

and you are the Data Principal. “You”, “customer”, “user” and “borrower” mean a person who uses Jivikaloan through the mobile application (the “App”) or the website.

This Policy forms part of our Terms and of the agreements you sign for a loan (the “User Loan Agreement”). Words not defined here have the meaning given in the Terms. We may revise this Policy from time to time (see section 12). If you do not agree with any part of it, please stop using our services.

1. DATA COLLECTED BY US

We collect the data you provide, and data generated by your use of the App, to provide our services, to assess the risk of a loan and to determine its rate and tenure. The data we collect is described below.

Consent Notice

By applying on Jivikaloan, you give your free, specific and informed consent for AFL to process your loan application and the data described in this Policy for the purposes stated in it. Data is transmitted over encrypted channels (TLS) to AFL’s systems for credit assessment. AFL does not sell your personal data.

A. Data Collected at the Signup / Onboarding Stage for Using Our Services

When You visit Jivikaloan Website, the administrator processes technical data such as Your IP-address, Device ID or MAC-address, information about the manufacturer, model, operating system of Your mobile device, the internet browser you use to enable us to deliver the functionalities of the Website. In addition to this, in certain instances the browser may prompt you for your geo-location to allow us to provide you with an enhanced experience. With this technical data the Website administrator can manage the Website, for instance by resolving technical difficulties or improving the accessibility of certain parts of the Website. This way, we ensure that You can (continue to) find the information on the Website in a quick and simple manner. We collect the data you provide to us when you create or update your Jivikaloan account. This includes your full name, phone number, email ID, gender, photograph, marital status, PAN, verifies Aadhaar Number linked with your Mobile Number, date of birth, pin code, nature of employment, official employment email address, name of employer, monthly income. We may require you to share further information on a later date to confirm the veracity of your information or pursuant to any additional features added to the App.

We use this data provided by you for enabling the App and its Services for:

a. Loan Processing and KYC Authentication
b. For Enabling Customer Support
c. For Research and Development
d. For Enabling Communications Between You and Us
e. For enabling Marketing and Outreach
f. For Automated Decisions
g. For Legal Compliance and Requirements.

Financial and KYC Information: For Loan Processing and KYC Authentication We collect the data you provide when you accept the tentative terms of the loans. This includes your photograph, Aadhaar Number verification linked with your Mobile Number, PAN, parents’ names, bank account number, IFSC, One of Officially Valid Documents specified in RBI-KYC directions (Driving License, Voter’s ID, NREGA Job Card, Passport etc.) and transaction information, and any other KYC (Know Your Customer) information required by law to provide our Services.

How we use this data: For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Legal Compliance and Requirements.

Other Data Solicited for enhanced functionality and improved Service: You may be required to provide further information to us for the purposes of processing your loan application. Such additional information may include (without limitation) bank statements, goods and services tax returns, salary, income statements, type and version of the internet browser/operating system, type and manufacturer of the mobile phone, name and version of system and application software. This data shall be supplied to us through AFL.

How we use this data: For Enabling the App and its Services; For Loan Processing and KYC Authentication; For assessing the quantum and interest rate of loan to be extended; For Legal Compliance and Requirements.

Feedback Data and Other Data: This includes the following:

- If you call our call centers, we may record information provided by you to service you or record the calls for quality and training purposes.
- Data you input when you participate in our referral programs or use any discount codes offered by us.
- If you provide any feedback or comments to us on the App.

How we use this data: For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Legal Compliance and Requirements.

B. Data We Collect from Usage of Our Services

Geolocation Data: We collect the location data from you in two ways: (i) when you add the pin code as part of your Jivikaloan Account data; and (ii) from your mobile device when enabled by you to do so. The location data helps us to provide you with better loan offers, for KYC, reduce risk associated with your loan application and also to prevent any Fraud.

User Personal Information: The app collects user account data which includes email address, name to log in to the app. This information is required as part of the registration process to access our service and it is also used to auto populate relevant fields in the course of the interface of the app. The app also collects mobile numbers for verification to check the active SIM status on the device uniquely identify you and prevent fraud and unauthorized access. We also collect the AAID for advertising and analytics.

Financial SMS Data: AFL may collect all of the SMS data and transmits only financial and promotional SMS data to Jivikaloan server while transmitting/analyzing only your Financial transactional SMS data. We monitor only your financial transactional SMS which helps us in identifying your bank accounts, cash flow patterns, names of transacting party, description and amount of the transactions undertaken by you to help us perform credit risk assessment enabling us to determine your risk profile and provide you with the appropriate credit analysis and to prevent fraud thereby helping us to provide you with quicker loan disbursal. This data may be collected even when the app is not in use. No personal SMS data is stored by us on the server. You will not be able to use the App if you disable this access.

Device Data: The app collects and monitors specific information about your device including your hardware model, RAM, storage; unique device identifiers like IMEI, serial number, SSAID, SIM information that includes network operator, roaming state, MNC and MCC codes, WIFI information that includes MAC address and mobile network information to uniquely identify devices and to prevent fraud. This also helps in enriching your credit profile and providing you with the best loan offers according to your profile.

How we use this data: For Enabling the App and its Services; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach

App Data: We collect the data about your installed applications, including the applications and package name, installed and updated time, version name and version code for all applications installed on your device on and from the date you create your Jivikaloan Account and the manner in which you use them. This also includes having access and permission to send you messages and notifications via your social media and instant messaging applications. We use this to assess your credit worthiness and provide you with pre-approved customised loan offers. You will not be able to use the App if you disable this access.

Microphone: We require microphone permission to initiate two-way audio communication as a part of KYC journey. This may be stored for future verification purposes.

Usage data: AFL collects data about how you interact with their Services. This includes data such as interaction patterns, access dates and times, App features or pages viewed, App crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with the Services.

Transaction information: AFL collects transaction information related to the use of our Services, including the type of services requested, date and time the service was provided, loan availed, interest payable, EMI selected, and payment method.

Storage: This permission is required so that users' documents can be securely downloaded and saved on users' phones and upload the right documents for a faster approval and disbursal of the loan. This helps provide a very smooth and seamless experience while using the app.

Media: Jivikaloan collects, syncs, transmits, stores images/documents uploaded by the users which are provided by them as a proof of Employment / Education / Business for Jivikaloan to verify the data shared by the users. This helps to assess their ability to repay the loan and other financial obligations accurately. To share the images, the user is required to select the appropriate image from their device and no other media is accessed other than the selected one.

C. Information Received from Other Sources

We may lawfully receive information about you from third parties such as credit information companies, business partners, technical sub-contractors and analytics providers. Such data may be combined with the data collected on the App.

How we use this data: For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements

2. USAGE AND PURPOSE OF DATA COLLECTED

The data that is collected in accordance with Section 1 above will be used in the manner detailed below:

A. For Enabling App & Its Services

The data collected is used to personalize, maintain and improve our Services. This includes using the data to:

Create and update the Jivikaloan Account. Analyze your loan eligibility and estimate your loan terms. Track the disbursement and repayment of the loan. Enable features that allow you to add and remove bank accounts for your loan repayment and disbursements from time to time. Enable features that help you check your loan history and other such App features as may be added from time to time. Perform internal

operations necessary to provide Services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.

B. For Loan Processing and KYC Authentication

We use the data to analyze your creditworthiness, loan eligibility, KYC documents, current employment verification and the terms of your loans. AFL collects the Financial and KYC Information to individually process the loan requests and verify the KYC documentation received. Failing to process such data means that you cannot be provided any loans. You hereby grant us explicit consent to fetch your KYC (Know Your Customer) details from the Central KYC Records Registry using the details provided by you. We also use the data to track disbursement and repayment of your loan.

C. For Enabling Customer Support

AFL uses the information to provide customer support, including to resolve your concerns from the use of the Services, and train customer service executives.

D. For Research and Development

The data so collected by us may be used for research, analysis, and product development to improve the UI/UX experience – all of which will ultimately improve how you experience the App. This also helps AFL develop automated actions to be triggered in certain events, such as to identify if photographs uploaded are not clear, fraud takes place, IFSC is incorrect etc.

E. For Enabling Communications Between You and Us

AFL may add features that allow you to call us (through the App or otherwise), similarly, AFL may also need to contact you (through the App or any other channels that you give us access to, such as WhatsApp).

F. For Marketing and Outreach

AFL may use the data collected to market the App and its Services. This includes sharing your feedback, ratings and screen names for purely promotion and marketing purposes. Such promotion and marketing may be done via hoardings, banners, pamphlets etc.

G. For Automated Decisions

The App may provide automated features for customer responses, reimbursement tracking, etc. As the App grows, AFL will keep adding more automated features to the App.

H. For Legal Compliance and Requirements

We process your data to meet the requirements of applicable laws, regulations, standards, rules, codes and the requirements as may be applicable on non-banking financial institutions and other codes with which company must comply. This includes: authenticating and validating your access to your account or to mitigate and protect against identity theft or fraud. To do this, some of your data may be collected by us or our service partners. It will use this Information for the purpose of anti-fraud systems and this may be retained by us for our future use for reference and cross-reference of information.

- consulting and reporting your Information and behaviour on monetary obligations to legitimately constituted financial, commercial or service risk centres, or to other financial institutions, under applicable laws of India.

- verifying your identity and comparing your Information to verify accuracy for reporting obligations under applicable laws or KYC norms;
- processing your information for the purpose of ensuring compliance under applicable laws and for resolving or contesting any claims made by or against you /against us, our group companies, our service partners or any other third party;
- processing (including storing or using) your Information to ensure business continuity of our businesses and appropriate disaster recovery for the Websites, Apps, services and products.

We may use the data we collect to investigate or address claims or disputes relating to use of our Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

I. For Product Innovation

AFL may use the data collected to offer new products and services for your use.

3. SHARING OF THE COLLECTED INFORMATION

We use your personal data only for purposes directly related to our services or as otherwise permitted by law. We may share it under data-sharing or non-disclosure agreements where needed to provide you with our services and products. The main cases are set out below.

Sharing of Information with Third Parties

Service Providers: Trusted partners who act on our behalf under confidentiality and data-processing terms. They may be engaged for the following purposes:

- analysing transaction behaviour and cash flows from your SMS, bank statements, GST returns, salary and income statements and income tax returns, on which your loan offer is based;
- validating and authenticating the official documents you provide, and verifying your employment status, information and duration;
- processing card and other payments;
- e-signing and populating the User Loan Agreement or Sanction Letter (information shared for this is retained for audit of the agreement);
- fraud detection and flagging;
- cloud hosting and support and maintenance of the services;
- marketing services, administering promotions, and analysing customer behaviour to automate outreach;
- collection and recovery of sums owed to us;
- gathering additional bank account or statement details where those you provided are not adequate; and
- customer service.

We share with these providers only the data needed for the stated purpose.

Third Party Services: The App may allow you to connect with other websites, products, or services that we don't have control over. You agree that we use other third parties such as payment gateway etc. to enable you to make payments for availing Services on Application. When You sign up for these Services, you may have the ability to save Your card details for future reference and faster future payments. In such cases, we may share Your relevant Personal Information as necessary for the third parties to provide such services, including your name, residence address and email address as available in our records. The processing of payments or authorization is solely in accordance with these third parties' policies, terms and conditions and

we do not have oversight of these third-party websites, plug-ins and applications and we are not in any manner responsible or liable to you or any third party for their processing or using of your information. Any information collected by a third party in this manner is subject to their data privacy policies and not within our control and you must make yourselves conversant with those. We recommend that you have a look at their privacy policies before agreeing to use their services.

Credit bureaus to report financial information: We being an NBFC disclose your 'Credit Information' to Credit Information Companies viz. TransUnion CIBIL, Equifax, CRIF High Mark and Experian as a mandatory requirement under applicable laws in India.

CKYC: We upload and fetch KYC records on the Central KYC Registry, as required under applicable laws in India.

Affiliates and Group Companies: Subject to applicable law, we may share any data we have collected or collect from you with our affiliates and group companies for product research and development, advertising relevant products to you, and to tailor the products for your benefit.

Third-Party SDK: The App includes a registered third-party SDK which collects data on our behalf and stores it on a secure server to perform credit risk assessment.

Disclosure required by law: We may disclose personal data without your consent where required by law, for example where a court warrant or notice requires us to produce records, or where we share information with government authorities, courts or regulators to investigate, prevent or act on illegal activity, suspected fraud, threats to the physical safety of any person, or violations of our terms or policies.

4. DATA SECURITY PRACTICES

We take reasonable security safeguards to protect personal data from misuse, loss and unauthorised access, modification or disclosure, in accordance with statutory requirements. These include access limits, cryptography, physical and environmental security and audit monitoring.

In particular, we implement the following controls, aligned to industry practice:

- Information Security Management System certified to an international standard
- Firewalls on the network perimeters
- Data Loss Prevention (DLP), Encryption, limited access, use of passwords, for better safety of the information given by you
- Secure-System Development Lifecycle (s-SDLC) controlling the internal developments
- Log Management and monitoring of Vendor Alerts
- Penetration Tests and Vulnerability Assessments
- Anti-virus protection with regularly updated virus-definition data
- Application of available patches through regular patching cycles.

If you take the payment gateway to make payments then the credit/debit card being used by you will be stored in compliance with industry standards/ recommended data security standards for security of financial information such as the Payment Card Industry Data Security Standard (PCI-DSS).

We also take the following measures to prevent loss, theft, leakage, external attack and hacking of your information:

Minimizing the number of managers processing personal information: We minimizes the number of managers processing personal information.

Encryption of personal information: Password of User is managed and stored in encrypted manner. Confirming and changing password is only possible by the User who knows correct password.

Technical measures against hackings, etc.: We use anti-virus solutions and inspects the solution on regular basis to prevent damages from computer viruses and hackings. We also use technical and physical measures including installation of systems with limited external access.

Promoting Awareness among the staff: Staff will be trained on the privacy policy and its implications. At the time of appointment, each staff will be made to sign a non-disclosure/confidentiality clause, thereby agreeing to protect us and our clients' data.

Managing IDs and passwords: ID and password of a User can be used by the Authorized User only. We will not be responsible for personal information leakage by negligent act of the User or accidents from inherent weakness of the Internet.

The transfer of personal data between your end device and AFL is generally carried out via best-in-class encryption protocols. If you communicate with us by e-mail, access by third parties cannot be ruled out. In the case of confidential information, we recommend using the mail, i.e., post or encrypted email communication (PGP)

5. PERSONAL DATA BREACH

5.1 A "personal data breach" means any unauthorised processing of personal data, or accidental disclosure, acquisition, sharing, use, alteration, destruction or loss of access to personal data, that compromises its confidentiality, integrity or availability.

5.2 On becoming aware of a personal data breach, we shall act promptly to contain it, assess its scope and impact, and prevent recurrence.

5.3 We shall inform each affected user without delay. The intimation shall describe the nature, extent and timing of the breach, its likely impact, the measures taken to mitigate the risk, the safety measures the user can take, and the contact details of our Grievance Officer.

5.4 We shall also intimate the Data Protection Board of India without delay, and give it a detailed report within 72 hours of becoming aware of the breach (or such longer period as the Board permits), as required by the DPDP Act and Rules.

5.5 We shall report cyber incidents to the Reserve Bank of India and CERT-In within the time limits applicable to us under their directions.

5.6 Please report any suspected breach, unauthorised access to your account or fraud in the name of the Company to contact@jivikaloan.com immediately.

6. CONSENT AND WITHDRAWAL OF CONSENT

6.1 **Consent.** We process your personal data on the basis of your consent given through this Policy and at the relevant step in the App, or for the other lawful purposes permitted by the DPDP Act, such as compliance with law and RBI directions. Your consent is free, specific, informed and unambiguous. Where applicable law requires a separate consent for a purpose, we shall obtain it separately.

6.2 **Optional processing.** Consent for purposes that are not necessary for your loan, such as marketing, is not a condition of receiving our services, and you can decline it or withdraw it at any time.

6.3 **Data received from others.** For information obtained from third parties or group entities, we rely on the consent obtained by them in our favour, and on the other lawful grounds available to us.

6.4 **Withdrawal.** You may withdraw your consent at any time by writing to contact@jivikaloan.com from your registered email address, mentioning your registered mobile number. Withdrawing consent is as easy as giving it. Uninstalling the App does not by itself withdraw consent.

6.5 **Effect of withdrawal.** Withdrawal does not affect processing done before it. If you withdraw consent to data that is necessary for your loan, such as Financial and KYC Information, we may not be able to provide some or all of our services. If you have a loan outstanding, we may continue to process your data until the loan is repaid in full with interest and dues, and for as long as law or RBI directions require us to keep it.

6.6 After you withdraw consent, we shall stop processing your personal data and ask our service providers to do so, and shall delete it in accordance with sections 8 and 9.

7. YOUR RIGHTS REGARDING THE DATA

You remain in control of your data. Under the DPDP Act you have the following rights, which you can exercise by writing to **contact@jivikaloan.com**:

7.1 **Right to information:** to obtain a summary of your personal data that we process and the processing activities, and the identities of the other Data Fiduciaries and processors with whom we have shared it.

7.2 **Right to correction and updating:** if any data you gave us is inaccurate, incomplete or outdated, you may ask us to correct, complete or update it. Please keep your information accurate so that your use of our services is not interrupted.

7.3 **Right to erasure:** to ask us to erase your personal data, subject to section 8 and to the data that we must retain by law (see section 9).

7.4 **Right to withdraw consent:** as set out in section 6.

7.5 **Right of grievance redressal:** to have any grievance about our handling of your personal data or the exercise of your rights addressed by the Grievance Officer (see section 11), and to approach the Data Protection Board of India if you are not satisfied.

7.6 **Right to nominate:** to nominate another individual to exercise your rights in the event of your death or incapacity.

7.7 **Right to opt out of communications:** you may opt out of promotional emails by writing to us or using the unsubscribe link, and of push notifications through your device settings (which may affect your use of the App). We shall still send non-promotional communications, such as payment receipts and service messages.

7.8 We shall respond to your requests within the timelines stated in section 11. We may take reasonable steps to verify your identity before acting.

8. DATA RETENTION

We retain the information you provide so that we can provide you with the App and our services, and:

a. to provide, improve and personalize the Services;

b. to contact you about your account and give customer service;

c. to personalize our advertising and marketing communications; and

d. to prevent, detect, mitigate, and investigate fraudulent or illegal activities.

We do not keep personal data for longer than needed for the purpose for which it was collected, unless a law requires otherwise. How long we keep it depends on legal (contractual, statutory and regulatory), accounting and compliance reporting requirements. In particular, your documents and information shall be retained for **ten years from the date of the transaction**, as required by applicable laws and RBI guidelines. When the period ends, the data shall be deleted or anonymised, unless we need it for a pending legal, regulatory or audit matter.

9. DATA DELETION

9.1 You can ask us to delete your information at any stage. This section is in line with applicable laws and RBI guidelines and should be read with our Data Deletion Policy.

9.2 To request deletion, send an email to **contact@jivikaloan.com** from your registered email address with the subject **"Delete my account"**, and mention your registered mobile number. You can also make the request from the FAQ section of the App.

9.3 On receipt of the request:

(a) **Approved Users with no outstanding loan:** the account shall be deleted and the user will not be able to log in or use our services. Data that we must retain shall be kept as described below.

(b) **Approved Users with an outstanding loan:** the user must first close the loan(s) and may then request deletion of the account.

(c) **Un-approved Users:** all of the user's data shall be deleted once the request is processed, except the archived data described below.

9.4 The data archived for both Approved and Un-approved Users, as required by law, shall be limited to the Mobile Number, Email Id, User Id, External User Id and Profession, and is kept for the period stated in section 8.

10. MINORS

Our services are not directed to persons under 18 years of age. We do not knowingly collect personal data of children, and we do not track or monitor their behaviour. If we find that a child has given us personal data, we shall delete it and terminate the Jivikaloan account concerned.

11. GRIEVANCE OFFICER

11.1 If you have a question or complaint about how we handle your personal data, or wish to exercise any right under this Policy, please write to our Grievance Officer. [Name and designation of the Grievance Officer to be inserted by Ajivika.]

Email	contact@jivikaloan.com
Address	Ajivika Finance Limited, B-84, Second Floor, B Block, Sector 64, Noida, Uttar Pradesh – 201301
Website	www.jivikaloan.com

11.2 We shall acknowledge your request or complaint promptly and resolve it within a reasonable time, and in any case within the period permitted by the DPDP Act and Rules (not more than 90 days).

[Company to confirm the internal timeline, for example acknowledgement within 2 working days and resolution within 30 days.]

11.3 If you are not satisfied with our response, you may escalate the matter as set out in our Grievance Redressal Policy, and may also approach the Data Protection Board of India.

12. CHANGES TO THIS POLICY AND YOUR DUTY TO INFORM US

12.1 We may change this Policy from time to time. The current version is published on our website and App, and we shall notify you of material changes by publishing them there. Your continued use of our services after a change means that you accept the updated Policy, to the extent permitted by law.

12.2 It is important that the personal data we hold about you is accurate and up to date. Please tell us of any changes.

13. COMMUNICATION FROM US

We may contact you by calls, SMS, email, push notification and other channels with information about our services, updates, security and administrative messages, educational content and, where you have not opted out, promotions. We may also notify you if we need to suspend the App temporarily for maintenance.