

PRIVACY POLICY

PLEASE READ THE TERMS AND CONDITIONS OF THIS POLICY CAREFULLY, BEFORE ACCESSING OR USING THIS WEBSITE OR THE APPLICATION (APP) WHENEVER INSTALLED OR USED BY YOU. BY ACCESSING OR USING THE ARTHAN WEBSITE OR THE APP INCLUDING ITS PRODUCTS AND SERVICES, YOU AGREE TO THE TERMS OF THIS POLICY. IF YOU ARE ACCEPTING THIS POLICY ON BEHALF OF ANOTHER PERSON OR COMPANY OR OTHER LEGAL ENTITY, YOU REPRESENT AND WARRANT THAT YOU HAVE FULL AUTHORITY TO BIND SUCH PERSON, COMPANY OR LEGAL ENTITY TO THESE TERMS.

INTRODUCTION

Arthan Finance Private Limited, a company incorporated under the applicable provisions of the Companies, 2013, having its registered office at **#307, Shah Prima, Plot No - 13, Sector 2, Kharghar, Navi Mumbai, Maharashtra 410210** ("Arthan" or "AFPL") and during the normal course of business Arthan may collect, store use, disclose, transmit, transfer information, including but not limited to personal and business information of the viewers, users and customers ("Users" or "You" or "Your"), on the website www.arthan.finance and/or www.arthanfinance.com and/or android app hosted on google play store, owned and maintained by Arthan. For brevity sake the information provided by Users or You shall be referred as Your / User Information.

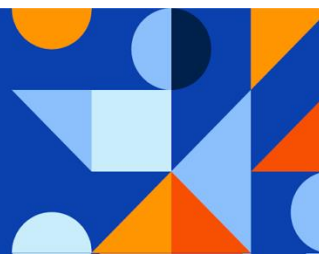
Confidentiality and integrity of Your / User Information is of paramount importance and therefore Arthan has put in place the privacy policy (the "**Policy**") as per the applicable provisions of Information Technology Act, 2000 including rules and amendments thereof (the "**Act**"). The Policy spells out how Arthan collects, stores, uses and shares the Viewers / User Information in connection with the use of [**www.arthan.finance and www.arthanfinance.com** or the APP including all subdomains, if any, (collectively, the Site) and Arthan products and services.

Further, the Policy also explains Your choices for how Arthan handle Viewers / Users Information. For convenience, the Sites and Arthan services are collectively referred to as the "**Service**." This Policy applies only to personal information of users of the Site or Service and shall not apply to any third-party Services, which are governed by their own privacy policies.

1) TYPE OF INFORMATION COLLECTED BY ARTHAN.

A) Personal Information.

The Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 defines "Personal Information" as 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. Therefore, for the purpose of this Policy, the term "Personal Information" shall include, without limitation, any and all information that you disclose to Arthan and which can be used to uniquely identify or contact you or reasonably can be linked to information that identifies you. For example, your name, mailing address, e-mail address, phone numbers, credit/debit card



number or other payment information and also demographic and lifestyle information, such as age, personal interests and product preferences.

B) Business Information.

You may disclose or asked to disclose certain information related to your business “**Business Information**” while accessing or using Arthan website, domain and sub domain, if any. Such Business Information may include the below illustrative and not exhaustive list of information and without any limitation.

- a) The name and address of Your business entity.
- b) Nature of Your business entity i.e. private limited, public limited, partnership firm, limited liability partnership etc.
- c) The Corporate Identification Number and or registration number as applicable.
- d) Details of any shareholding and management.
- e) Details of any corporate structuring or restructuring including but not limited mergers or acquisitions, demergers, reverse mergers and takeovers.
- f) Details of any credit or debt facility availed or investments made by Your business entity or any indebtedness incurred to You.
- g) Business contact information (such as job title, department and organization’s name, statutory details, filings, identity, and business proofs)
- h) Any such other information which may or may not be publicly accessible.

C) Non-Personal Information.

For the purpose this Policy, Non Personal Information shall mean and include those information which does not specifically falls under the ambit of Your Personal Information or Your Business Information and which does not specifically identify any person or business but includes information provided by You like browser type, URL of sites visited by you, details of Your internet service provider (ISP), Your communication device operating system, internet protocol address and any other information that is voluntarily provided by You in response to feedbacks, questionnaires or surveys conducted by Arthan on its own website or on any other social media or social networking platforms.

D) Public Domain Information.

Arthan may collect Your information maintained by government agencies and other statutory and quasi-statutory bodies open for public inspections and limited to permissible purpose. Arthan may have access to documents uploaded by You or your business on the Ministry of Corporate Affairs website, including incorporation documents, compliance forms and annual return filings, details of charges created on Your immovable assets and filed with Central Registry of Securitization Asset Reconstruction and Security Interest (CERSAI) and other documents maintained with sub registrar office (SRO) of Your jurisdiction, Arthan jurisdiction or the jurisdiction where such immovable asset is situated.

2) MODE OF INFORMATION COLLECTION

A) Information You Provide to Arthan.

Arthan collects Your Information while you voluntarily disclose information on the website of the Arthan for the purpose of availing the products and services offered by Arthan.

B) Information from Third Party

Arthan may collect Your Information from any third-party sources to enable you to directly login or sign up with your account maintained with Arthan. Or to provide you better experience on Arthan website and

provide You updated information about Arthan's products and services. For example, if You use an integrated social media feature on Arthan's websites. The third-party social media site will give Arthan certain information about You. This could include your name and email address.

C) Passive Collection of Information

Arthan may also collect information from you about your preferences in using its services by using cookies and/or other methods. Arthan may use cookies to monitor website usage including, without limitation, to provide useful features to simplify your experience when you return to the Arthan website or mobile application, like remembering your login ID and certain Personal and business information and to deliver relevant content based on your preferences, usage patterns and location. specific to such services.

D) Automatic Collection of Information

Arthan may automatically collect some of Your Information as a result of Your use of the website, or through the use of web analytics services. This information includes but is not limited to:

- a) The Internet Protocol (IP) address of the device from which You access the Platform (this can sometimes be used to derive the country or city from which you are accessing the Platform).
- b) The specific actions that you take on the Platform, including the pages that you visit, connecting your Facebook or Google+ account.
- c) The time, frequency and duration of your visits to the Platform.
- d) Your device type, make and model, your browser type and operating system.
- e) The nature of the device from which you are accessing the website, for example, whether you are accessing the website from a personal computer or from a mobile device.
- f) Your location data (e.g. Global Positioning System), calling history, contact list and messages when using Applications of Arthan.
- g) Arthan, as a part of activating an account, may request Your consent to connect with your email account for the purpose of collecting your bank statement / loan facility details and collecting such other information limited to the purpose of credit and risk scoring models. If you have installed, use or access Arthan's website from Your mobile phone or any other communication device using the App then Arthan from time to time may collect or have access to financial information contained in the short messaging services (SMS) stored in Your mobile phone or such other communication device.

3) USE OF YOUR INFORMATION (PERSONAL AND BUSINESS INFORMATION)

Arthan may use Your Information for the following purposes from time to time;

- a) To comply with legal and statutory compliance and in order to prevent, protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity under The Prevention of Money Laundering Act 2002 (the PML Act) and rules framed thereunder or any other guidelines issued by Reserve Bank of India from time to time.

- b) To capture, save, compile and analyze Your Information required to perform credit and risk scoring models and establish identity and assess applications.
- c) To create anonymous data from Your Information and other individuals whose personal information collected by Arthan and make Your Information into anonymous data by excluding information that makes the data personally identifiable to You, and use that anonymous data for our lawful business purposes.
- d) To communicate with you to respond to customer service requests, send marketing communications, and send account update notifications.
- e) To share the information with multiple financial institutions and other lenders for customization of offers and provision of services;
- f) To undertake research, troubleshooting, fraud and risk management and prevention of other criminal activity.
- g) To offer different innovative and personalized products and services for better customer experience.
- h) Arthan may provide different utilities for helping small businesses and collect relevant information to offer customized products and services.

4) SHARING YOUR INFORMATION

Arthan do not share or sell Your Information provide us with to other organizations without Your express consent, except as described in this Policy. Arthan may disclose Your Information to third-parties under the following circumstances:

Affiliates. Arthan may disclose Your Information it's subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

Service Providers. Arthan may engage third-party companies and individuals to administer and provide the Service on behalf of Arthan (such as Direct Selling Agents, Recovery Agents, and Business Correspondents and database management services). These third-parties are permitted to use your personal information only to perform these tasks in a manner consistent with this Privacy Policy and are obligated not to disclose or use it for any other purpose.

Professional advisors. Arthan may disclose Your Information to professional advisors, such as lawyers, technical agency, bankers, auditors and insurers, document verification agency where necessary in the course of the professional services that they render to Arthan.

Compliance with Laws and Law Enforcement; Protection and Safety. Your Information can be disclosed to government or law enforcement officials or private parties as required by law, and disclose and use such

information as Arthan in its sole discretion believe necessary or appropriate to comply (i) with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities (ii) enforce the terms and conditions that govern the product and services of Arthan.

Sale / Acquisition / Transfer: Arthan may disclose and/or transfer Your Information to an acquirer, assignee or other successor entity in connection with a sale, merger, or reorganization of all or substantially all of the equity, business or assets of Arthan.

5) SECURITY

Arthan is concerned with the security of Your Information collected and uses commercially reasonable measures to prevent unauthorized access to Your Information. These measures include but not limited to;

- a) Internal policies
- b) Handling procedures
- c) Employee training
- d) Restricted physical access
- e) Technical elements relating to data access controls.

In addition, Arthan uses standard security protocols and mechanisms to facilitate the exchange and the transmission of sensitive data, such as financial information and credit reports. Encrypted point-to-point connections are used to communicate between systems to protect Your financial information, as well as encrypting vital information that You input through the Site.

Although reasonable efforts are made to secure network communications and the Site, Arthan cannot guarantee that the information submitted to, maintained on, or transmitted from our systems will be completely secure.

6) EMAIL OPT-OUT

You can opt out of receiving our marketing emails. To stop receiving our promotional emails, please email unsubscribe@arthan.finance It may take about ten days to process your request. Even if You opt out of getting marketing messages, Arthan will still be sending you transactional messages through email and short message service (SMS) about your registration for any event or seminars.

7) COMMUNICATION PREFERENCES

During registration and when availing services, You can set your email preferences with respect to receiving certain communications from Arthan. In case You have opted to unsubscribe Arthan's newsletters and other general e-mail marketing communication then You will be unable to opt-out of receiving administrative messages, customer service responses or other transactional communications.

8) WITHDRAW CONSENT

You may withdraw Your consent for the use or disclosure of Your Information for the purposes set out in this Policy, You may not have access to all the products and services of Arthan. However, in such situation

Arthan may be unable to provide its product and services to You efficiently.

9) OPT OUT

You agree and acknowledge that you are providing your information out of Your free consent. Subject to certain exceptions prescribed by law and provided Arthan can authenticate your identity, You can contact Arthan at hello@arthan.finance or send mail to;

Arthan Finance Private Limited

**#307, Shah Prime, Plot No - 13,
Sector 2, Kharghar, Navi Mumbai,
Maharashtra 410210**

- Access, verify, correct, update, amend, restrict, object to, or delete any information related to Your Information Arthan has about You.
- Opt to transfer your personal data.
- Change preferences regarding how Your Information is disclosed.
- Notify Arthan if You do not wish to receive further communication from Arthan.

If You opt out, You should not visit any Arthan's website, domain or sub-domain, use any services provided by Arthan or related Arthan entities, or contact any of Arthan entities. Arthan may deny You access of services offered on the website.

10) QUESTIONS OR COMPLAINTS

If you have any questions about this Policy, you may contact Arthan:

E-mail at hello@arthan.finance; or +91 89281 96550

Write to Arthan at:

Arthan Finance Private Limited

**#307, Shah Prime, Plot No - 13, Sector 2,
Kharghar, Navi Mumbai, Maharashtra 410210**

In accordance with Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011, if You have any grievances or concerns about this Policy or if you would like to make a complaint about a possible breach of privacy in relation to Arthan's website, you may contact the Grievance Officer at cro@arthan.finance.

11) CHANGE IN TERMS AND CONDITIONS OF THIS POLICY

Any substantial change or update or revisions of terms and conditions of this Policy will be notified by Arthan vide sending an e-mail on Your E-mail address as provided by You or maintained in the records of Arthan. Arthan shall not be responsible for verification of Your E-mail address and any such notification shall deemed to have been delivered and notified to You, the moment such notification reaches Your E-mail inbox or any sub folder of Your e-mail inbox including but not limited to spam folder.

12) E-MAIL COMMUNICATION AND GREEN INITIATIVE

Arthan is an eco-friendly company and believes in promotion and development of clean and green environment. As an initiative for clean and green environment Arthan has adopted E-mail as the preferred mode of communication with You and request You to use this preferred mode of communication with Arthan. You are requested not use paper or send any communication to Arthan in paper mode unless it is very urgent or You do not have access to Your E-mail.