

PRIVACY POLICY

Introduction

Savani Financials Limited (the “Company”) is registered with the Reserve Bank of India as a Systemically Important, Non-Deposit taking, Non-Banking Finance Company. It is listed on BSE Limited and is governed by the regulations of SEBI Listing Obligations and Disclosure Requirements) Regulations and the Companies Act, 2013. As per the Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023, (the “Directions”) the Company has been classified as a NBFC - Base Layer.

We at Savani Financials Limited are committed to protecting your privacy when dealing with your personal information. This privacy policy is intended to provide an overview of the information we collect, how we use it and how we protect it. While information is the cornerstone to provide our service, at the same time **Savani Financials Limited** ensures that the information provided to us for availing our services are kept secure and used only for legitimate and committed business us as consented by our upholding all our applicable legal and regulatory obligations. This privacy policy shall be read in conjunction with the terms of use agreed by the Customer while registering with Company for availing its Services.

Savani Financials Limited through the privacy framework ensures the following:

1. Safeguard, according to strict standards of security and confidentiality, any personal information shared with us
2. Limit the collection and use of personal information to the minimum required to deliver superior service, which includes advising our customers about our products, services, and other opportunities, and to administer our business.
3. Permit only authorized employees and third party, who are trained in the proper handling of customer information, to have access to that information.
4. Not to reveal any personal information to any external organization unless required by **Savani Financials Limited** to deliver the services, and authorized by the information owner, or are required by law. Provided that certain information may be provided to the affiliates, vendors, or regulators of **Savani Financials Limited** that have legitimate business reason and/or mandated by regulatory and legal obligations.

5. Maintain integrity of the information provided to **Savani Financials Limited**.

This page (“Data privacy policy” or “Policy”) provides overview of our policies and procedures for collecting, using, and disclosing the personal/customer information and outlines the security measures we’ve put in place to protect such information collected while delivering services by **Savani Financials Limited** including information collected through this web site, and any other software or services offered by **Savani Financials Limited** in connection with such services (the “Services”). By using these Services, you consent to the collection, transfer, processing, storage, disclosure, and other uses of your information described in this Privacy Policy.

What information does Savani Financials Limited collect and store?

When expressing an interest in obtaining additional information about the Services or registering to use the Services, **Savani Financials Limited** requires you to provide your personal contact information, such as your name, company name, gender, address, phone number, and email address, geographical information etc. (to be referred as ‘Contact Information’).

When availing the Services, **Savani Financials Limited** requires you to provide financial, billing information, KYC (know your customer) and organization details such as account information, financial information such as bank account details, profit loss statement, company PAN Card, balance sheets, GST, COI, Aadhar card, name and address, credit history, bank mandates, GPS, Geotagging, NACH information among others required to be able to serve our customers and required to maintain our legal and regulatory obligations (referred as ‘Customer Information’)

Company shall obtain a Customer’s consent in writing or electronically accessed by Company or Third Party as per the Consent provided by the Customer to Access the Contact Information and Customer Information with an audit trail of the purpose/ usage to provide Services under the terms of use.

Data shall be collected on need basis and as provided will be on ‘as on basis’.

Using **Savani Financials Limited** services, you will be able to create, upload, store and share information such as Contact and Customer Information (this is collectively referred as ‘Data’). This information will be stored and maintained by **Savani Financials Limited** in both physical and digital medium. If you run into technical errors in the course of using the Services, **Savani Financials Limited** may request obtain some additional information like account details, transaction information, GPS, Geotagging etc. (“Diagnostic Information”). Such information may contain information regarding customer information, account information, transaction information etc. Additionally, certain login information may be maintained in a cookie stored locally on your computer (i.e., not on a server) in order to streamline the login process (“Login Information”) depending on the services used.

As you navigate **Savani Financials Limited** website and use our Services (and/or applications), **Savani Financials Limited** may also collect information through the use of frequently used information-gathering tools, such as cookies and Web beacons (“Website Navigational Information”). Further to improve our service **Savani Financials Limited** utilize the truncated information stored and/or processed at **Savani Financials Limited** end for data analytics. Collectively, this information is referred to as “Analytics Information.”

Additionally, in case of Digital Lending (as defined under RBI Digital Lending Guidelines, September 2, 2022), Company shall desist from accessing mobile phone resources like file and media, contact list, call logs, telephony functions, etc, except if needed for the purpose of providing Services to Customers or when an express Consent is provided by the Customer. Further, to onboard the Customer through the use of mobile or web application and KYC regulatory requirements, mobile resource access for camera, microphone, location or any other facility necessary, shall be requested from the Customer. Customers have the option to not agree to the collection of Data. Customers can also at any time withdraw the consent and delete/ forget data by uninstallation of the application from the device of the Customer.

What does Savani Financials Limited do with the information it collects?

Savani Financials Limited uses the information it collects in the following ways:

1. Personal Contact Information – We use this information primarily to administer our Services to you and provide you with updates and product announcements. We may use some of your information for marketing purposes.
2. Customer Information – **Savani Financials Limited** stores this information to continue its services to the customer and information is retained at **Savani Financials Limited** as per **Savani Financials Limited**'s Retention / Preservation Policy, unless otherwise required under law.
3. Data, Diagnostic Information and Login Information – We use this information solely for the purpose of administering and improving our Services to you.
4. Analytics Information – **Savani Financials Limited** may use your Analytics Information in conjunction with an analytics service to monitor and analyse use of the Services, for the Services' technical administration, to increase the Services' functionality and user-friendliness, and to verify users have the authorization required for the Services to process their requests.
5. Share Customer's Data with any Third Parties in so far as required for purpose of providing additional services and / or to similar services to provide Customer with various value-added services

6. For market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
7. To Third-Party outsourced vendors that provide services to Company are bound by similar privacy restrictions;
8. Verifying Customer identity and address details and find nearest branches
9. Enabling secure downloads and uploads of documents related to loan, KYC, otherwise;
10. Managing phone calls and SMS/texts, Sending reminders, etc.;
11. Analyzing Customer's financial position/credit risk assessment/ credit appraisal;
12. "Know Your Customer" (KYC) requirements like verification or authentication (any nature);
13. Data enrichment; Making personalized offers of products and services, credit rating, promotion or marketing of Company's product or its group companies or Third Party.
14. For the purposes connected with Company's 'Terms of Use' on any of the Company information resource;
15. To undertake activities as may be permitted under law/regulations/directions/guidelines or by any authority or under any license or registration of the Company.
16. The Data so collected shall be used only for the purpose otherwise as may be expressly consented by the Customer.
17. All such Data collected shall be retained so long as Customers are having account with Company and remain active to avail various services and/or as may be required under the law or by any authority. In case of deactivation / termination of the account / services with us, the Data provided will no longer be used unless consented for.

Update of Data

Company encourages the Customers to update this information as and when there are any changes. The Customer is also entitled to review the information provided and ensure that any Data/ personal information found to be inaccurate or deficient be corrected or amended as feasible. However, Company shall not be responsible for unverified, inaccurate or un-updated Data supplied or Accessed from the Customers.

Sharing/ Transfer/ Disclosure of Personal/Customer Information

A. Marketing and Publicity

As per our Privacy and Conditions, you agree to permit **Savani Financials Limited** to identify you as a customer and to use your name and/or logo website and marketing materials.

B. Sale of Personal Information

Savani Financials Limited does not sell, rent, or trade your private information to any third parties in any way.

C. Service Providers and Business Partners

Savani Financials Limited may use certain trusted third-party companies and individuals to help us provide, analyse, and improve the Services (including, but not limited to, KYC verification, Credit Rating, data storage, maintenance services, database management, analytics, payment processing, and improvement of the Services' features). These third parties may have access to your information strictly for the purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy.

D. Lending Service Providers

Lending Service Providers (as defined under law) or Third Parties are also bound by a contractual obligation to ensure confidentiality of shared data and to comply with various technology standards/ requirements on cybersecurity stipulated by RBI and other authorities, as may be specified from time to time.

Details of Lending Service Providers (where and as applicable) allowed to collect Data through the web- based or mobile application is as available on the website of the Company.

Non-Private or Non-Personal/Non-Customer Information

We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our Services, in our discretion.

Unsolicited Information

Except where specifically agreed or necessary for operational or regulatory reasons, Company will not send the Customer any unsolicited information. However, to help the Customer to take full advantage of the service offerings of the Company the Customer will have the opportunity to indicate whether the individual would like to "opt out" of receiving promotional and/or marketing information about other products, services and offerings from Company and/or any Third Parties etc. If the Customer does not opt out, Company may use any email addresses of Customer to send occasional emails pertaining to the said information. The Customer can

nevertheless unsubscribe from receipt of such emails by following instructions therein or by communicating accordingly to Company.

Our Use and Disclosure of Information

Savani Financials Limited will not disclose any personal/customer information except as set forth in this Privacy Policy. This applies to information about our customers and information our customers provide to us about their customers. We are not limited in any way in our use of non-personal information that does not permit direct association with any specific customer or non-identifiable aggregate information about our users (such as the number of customers who use our services, the geographic distribution of our users, the amount of information located and/or removed, etc.).

Internal Uses of Your Personal/Customer Identifiable Information

1. We collect, store, and process your personal/company information on servers and physical located in the within boundaries of India.

This includes the following:

- a. **Savani Financials Limited** and its trusted partners Offices
- b. Data Centre Maintained inhouse at **Savani Financials Limited** office
- c. Cloud Service Provider (Microsoft Azure, Amazon Web Services Mumbai, India region only.)

2. Due to the unpredictable nature of Internet routing, your information may pass through other countries while in transit to our servers.

3. We use the information we collect about you in order to:

- a. Deliver our services
- b. Process your transactions
- c. Provide customer service and manage your account
- d. Improve our products, services, and marketing.
- e. Maintain Legal and Regulatory obligations on **Savani Financials Limited**

4. We provide access to personal/customer information about our customers only to those who require it for the above purposes.

5. **Savani Financials Limited** will not sell or rent any of customer information to third parties. **Savani Financials Limited** will not share any of your personal information with third parties except in the limited circumstances described below.

- a. We share information with service providers under contract who help with our business operations such as but not limited to payment and order processing, fraud investigation, verification, and information management and analytics. These third parties are obligated to protect your information and are contractually prohibited from using your personally identifiable information for any other purpose. They are never permitted to share your information with any third parties. They are authorized to use your personal information only as necessary to provide these services to **Savani Financials Limited**.
- b. We disclose information in response to a circular, subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action. If the subpoena seeks information about an identified subscriber or limited group of subscribers, we will make reasonable business efforts to contact the information owners before providing information to the party that requests it. We cannot guarantee that we will be able to do so in all cases, whether due to a time limit, court order, inability to effectively contact a subscriber, or other circumstances.
- c. We are under Regulatory and Legal obligations so some of the information is shared with Legal and Regulatory bodies as a part of our due diligence and periodic mandatory filings.
- d. We disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- e. We share information with companies that provide public relations and marketing services for us. Such information will only be shared by us to customize, measure, and improve our products, services, and advertising. It will not be shared with third parties for their marketing purposes. These third parties are contractually obligated to protect your information and are prohibited from using your personal information for any other purpose.
- f. The delivery of our Services, by its very nature, may require using your Personal information to locate other information about you. Such use may include, but not be limited to, using your information to search the publicly accessible resources, Internet sites as well as searching private information databases and sites and market feedbacks.
- g. The delivery of our Services, by its very nature, may require revealing your personally identifiable information to the partners (Banks, Credit Agencies etc.), regulators etc. For example, we may have to disclose your information in such cases. This occurs with your express permission for a specific, given purpose.

INFORMATION PROVIDER'S RIGHTS

- a. All sensitive personal data or information provided by you has been voluntarily provided to us. You have the right to withdraw your consent at any time in writing by sending an e-mail to us at info@savanifinancials.co.in, in accordance with the terms of this privacy policy. However, please note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively. In case you do not provide your information or consent for usage of

sensitive personal data or information or subsequently withdraw your consent for usage of the sensitive personal data or information so collected, we reserve the right to discontinue the services for which the said information was sought.

b. You may write to us at info@savanifinancials.co.in to access, review, modify or correct your sensitive personal data or information or withdraw your consent to provide sensitive personal data or information. However, we are not responsible for the authenticity of the sensitive personal data or information provided by you.

Security Practices and Procedures

We use reasonable security measures, at the minimum those mandated under applicable laws, as amended from time to time to safeguard and protect your sensitive personal data or information.

We have implemented best practices and information security controls as applicable standards across our internal process & information assets.

Data Retention

We will retain your information for as long as your account is active or as needed to provide you the Services. If you wish to deactivate your account or request that we no longer use your information to provide you the Services, you may request for the same after fulfilling all contractual obligations and clearing out on the dues. Upon request while we try to delete your Data from our servers if there is any legal and regulatory obligation that prevents us from doing that, we shall retain the data as per our obligation. Please be aware that there may be a delay from the time you delete your Data to the time that your Data is removed.

Disposal, Destruction and Redaction of Data

Company Data Retention and Disposal require managerial approval for the disposal, destruction and deletion of any Data. Our disposal, destruction and redaction procedures prevent the recovery, theft, misuse or unauthorized access of Data. The same is governed under existing organization's policies/ procedures.

Compliance and Reporting

Company is committed to comply with this Policy and with applicable privacy laws, regulations and applicable guidelines from authorities. Company conducts regular audits of our compliance with applicable privacy policies, procedures, laws, regulations, contracts and standards under applicable regulations.

Changes To Privacy Policy

Company reserves the right to change Privacy Policy at any time. Users/customers may note that this Policy itself and any such change of Policy will be effective from the date of posting on www.savanifinancials.co.in and shall be considered disclosed to the users/customers.

DATA PRIVACY PRINCIPLES

In addition to the principles, practices and policies set forth above in this Privacy Policy, **Savani Financials Limited** has adopted the following principles to govern its collection and processing of Personal Data:

1. Personal/Customer Data shall be processed lawfully, fairly, and in a transparent manner.
2. The Personal/Customer Data collected will only be those specifically required to fulfil **Savani Financials Limited** obligations to deliver the services.
3. Personal/Customer Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal/Customer Data shall be accurate and, where necessary, kept up to date as feasible.

Review / Revision of Policy

If at any point a conflict of interpretation / information between the Policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities (“Regulatory Provisions”) arises, then interpretation of the Regulatory Provisions shall prevail. In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the Policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions.

Grievances

If you have any questions / escalations / complaints / queries regarding this Privacy Policy, please contact us at:.

Name Grievance Officer: Darsh Mehta

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