Sitaara



Data Protection and Privacy of Personal Data/Information Security Policy and Procedure

Prepared by:
SITAARA Housing Finance Limited
(Formerly known as SEWA Grih Rin Limited)

Distribution List

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Purpose

At SITAARA Housing Finance Limited (hereinafter referred to as “SITAARA”, “we”, “us”, etc.), a company incorporated under the provisions of Companies Act, 1956, having our registered office at 1st Floor, 216/C-12, Old No. C-12, Plot No. 13-B, Guru Nanak Pura, Laxmi Nagar, Delhi - 110092 and having corporate identity number U65923DL2011PLC222491, we value your trust and respect your right to privacy.

This Privacy Policy provides you with details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. If you do not agree to the terms of this Privacy Policy, please do not further use or access SITAARA website or SITAARA applications.

BSR (Business for Social Responsibility) places great importance on security of your personal data and only partners with vendors that adhere to the strictest security and data protection standards. BSR has implemented technical and organizational security measures to guarantee the security of your personal data. Information is stored on secure networks and access is restricted to those employees and partners who are entitled to access our systems.

This policy (the “Data Protection and Privacy Policy”) explains which personal data concerning you we collect when you visit our website (the “Website”), when and why we collect the personal data, how we use them, the conditions of our disclosure to third parties, as well has how we secured the stored personal data.

General

This privacy statement is applicable to website and applications (mobile and hybrid, hereinafter referred to “applications”) of SITAARA. This Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, or television or any other media or computer resource to access our Services. It also applies to those who register on our website/applications in connection with use of our services, or whose data SITAARA otherwise receives in connection with its services. It is important that you read the Privacy Policy carefully because whenever you use our website/applications, your personal data will be processed (if at all) in accordance with this policy.

Personal Data and its collection

Personal Data, means and includes, any data relating to identified or identifiable living person (‘data subject’ here in referred as you/your’) including but not limited to, name, address, mailing address, telephone number, email ID, bank account details including details linked to credit/debit payment instruments, information about your mobile phone, any

personal details that may have been voluntarily provided by the customer, whether to Unique Identification Authority of India (UIDAI), Credit Information Bureau of India Limited (CIBIL) or any other agency including any other Credit Information Companies (CIC).

I. Information Collected when you use our website.

We collect data about you or your usage to provide better services to all of our users. We collect data in the following ways:

- Many of our services require you to register/sign up for an account on SITAARA. When you do, we will ask for Personal Data, such as, but not limited to your name, email address, contact number, country, address to create/ update your account.
- When you use the SITAARA website to request a call back or more information or more assistance or to apply for new loans, we will ask for Personal Data including but not limited to Name, Email ID and Contact number.
- We may collect your personal data such as but not limited to financial details-bank statement, salary statement, family details-father, mother, spouse name for compliance requirement purposes.
- When you use the SITAARA website to provide feedback, we collect your Personal Data including but not limited to name, title, Email ID, contact number, address, and country.
- We collect data about the services that you use and how you use them. This data includes log data and location data.
- We may collect your data through campaigns and publicly available sources.
- When you communicate with SITAARA or use the SITAARA platform to communicate with other members, we collect data about your communication and any data you choose to provide.

If you choose to sign in with your social media account to access SITAARA, or otherwise connect your social media account with the services of SITAARA, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the data that you make available to us through the social media interface. Please see your social media provider's privacy policy and help centre for more information about how they share data when you choose to connect your account.

ii. Information Collected when you use our applications.

When you download our mobile application or use our hybrid application (related to our various services) we collect the below information, but not limited to –

Email ID

Name

Address

Country/City

Mobile Number

SITAARA does not collect Personal Data about individuals except when such individuals specifically provide such data on a voluntary basis. Upon such voluntary disclosure of Personal Data, we may further verify, collate, or receive data about you from publicly and commercially available sources (as permitted by law), which we may combine with other data we receive from you. We may also receive data about you from third-party social networking services if you are already connected with those services.

Lawful Basis of Processing

We may process your data because:

We have a contract with you.

You would have given us express permission to do so.

We must have provided services to you after you have purchased something from us.

We must have provided services to you because you have availed for one of our offers.

To comply with the law.

Use of Personal Data

We use Personal Data to provide you with loan you explicitly requested for, to resolve disputes, troubleshoot concerns, help promote safe services, assess your interest in our services, inform you about offers, products, services, updates, customize your experience, detect, and protect us against errors, fraud, and other criminal activity, enforce our terms and conditions, etc.

We may also use your Personal Data to send you offers regarding various services/facilities which SITAARA or its group companies may, from time to time, launch. Your consent will be taken before we send you any such communication.

We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, gender, etc.). We use this data to customize your experience at SITAARA. Since the surveys will be optional, any personal data you provide will be voluntarily given by you. All such data shall be transmitted and stored by us in an encrypted manner in accordance with all applicable laws to ensure the secrecy and confidentiality of the personal data and such personal data shall not be shared or used except as contemplated herein.

In the course of day-to-day business operations, authorized individuals within the Company may from time-to-time utilize and / or transfer Personal Data among various Company locations. These transfers of Personal Data are necessary in order to carry out the Company's General Business Purposes.

Specifically, Personal Data may be used as follows:

- To identify a Data Subject personally.
- To communicate with a Data Subject.
- To manage the business.
- To comply with human resource requirements.
- To comply with government regulations.
- To provide associate benefits.

Integrity of Personal Data

The Company will take reasonable steps that Personal Data and Sensitive Data are:

a) Obtained, where possible, directly from the Data Subject to whom the Personal Data relates.
b) Obtained and processed fairly and lawfully by the Company for General Business Purposes.
c) Relevant to and no more revealing than is necessary for General Business Purposes
d) Kept up to date to maintain data accuracy on best effort basis, while data is under the control of the Company, and kept only for so long as is reasonably necessary.

The Company informs Data Subjects about the purposes for which Personal Data is collected and used. In certain situations, Personal Data may be rendered anonymous so that the names of the Data Subjects are not known by Processors. In these cases, Data Subjects do not need to be notified.

Access to Personal Data

The Company takes steps on the best effort basis to make sure that the Personal Data it uses is correct. The Company will allow Data Subjects reasonable access to Personal Data about themselves during normal working hours and upon reasonable request and will be allowed to update and / or correct any inaccurate information.

Procedure for Accessing Personal Data

Questions about Personal Data and / or authorization to access such Personal Data are to be directed to Data Subject's concerned authority. Unauthorized access may be grounds for disciplinary actions, including termination.

Transfer of Personal Data

Subject to this Policy, the Company may from time-to-time transfer Personal Data within and between its various locations for General Business Purposes, in compliance with this Policy.

The Company's personnel, Directors, Shareholders, outside firms and consultants who receive Personal Data may be located in the Data Subject's home country or any other country in which the Company or its affiliates operate out of. Therefore, Personal Data may be transferred to any country in the world, including but not limited to India and other countries, and where the privacy laws may be more or less protective than the privacy laws where the Data Subjects live or work.

Accountability

The Company expects its employees, associates, independent contractors, subcontractors, and partners to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company. The Company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and data protection practices to the Company' supplier and partner relationships.

Procedure for Inquiries and Complaints

A Data Subject may contact the Company's Compliance Officer at the contact details given below with inquiries or complaints regarding the Company's processing of Personal Data.

Enforcement

The Company uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the principles. The Company encourages interested persons to raise any concerns using the contact information provided and will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the principles.

Amendments

This Privacy Policy may be amended from time to time consistent with the statutes of Government of India or any state or any other policy enforced by Company. Revisions will be posted on the Company's website(s).

Cookies and Other Tracking Technologies

Some of our Web pages utilize "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect data about Web site activity. Some cookies and other technologies may serve to recall Personal Data previously indicated by a Web user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original user ID and password to gain access to certain parts of the Web site.

Tracking technologies may record data such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our site/application is accessed. Our use of cookies and other tracking technologies allows us to improve our website/applications and your Web experience. We may also analyse information that does not contain Personal Data for trends and statistics.

Information Sharing and Disclosure

We restrict access to your Personal Data to employees who we believe reasonably need to know that data in order to fulfil their jobs to provide, operate, develop, or improve our products or services.

SITAARA does not rent, sell, or share Personal Data about you with other people or non-affiliated companies except:

a) to provide products or services you've requested,

b) when we have your permission,

c) or under the following circumstances:

- We provide the data to trusted partners who work on behalf of or with SITAARA under confidentiality agreements. These companies may use your Personal Data to help SITAARA communicate with you about offers from SITAARA and our marketing partners. However, these companies do not have any independent right to share this data.
- We may disclose your personal data to agents or contractors of SITAARA and/or its group companies/affiliates to enable processing of transactions or communications with you “on need” basis. Your aforesaid data may be further used for assessment and analysis of our market, customers, products, and services and to understand the way people use our Services so that we can improve them and develop new products and services. However, it shall be on the basis that the agents are required to keep the data confidential and will not use the data for any other purpose other than to carry out the services they are performing forSITAARA and/or its group companies/affiliates
- We may share your personal data with Sitara group and/or its affiliates for providing details on latest offers from our other entities.
- We respond to subpoenas, court orders, Government Authorities, law enforcement authorities for legal processes or to establish or exercise our legal rights or defend against legal claims where it becomes necessary to do so to protect the rights or property of SITAARA and/or its group companies/affiliates, etc.
- We believe it is necessary to share data in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of SITAARA terms of use, or as otherwise required by law.
- We transfer data about you if SITAARA is acquired by or merged with another company. In this event, SITAARA will notify you before data about you is transferred and becomes subject to a different privacy policy.

Consent to International Transfer of Data

When you use or participate in any of our Services and/or provide us your details, your data may be transferred outside India for processing consistent with this Privacy Policy. Please note that the data protection laws of countries to which your data may be transferred will be at least the same level as that of India.

In case your data is first processed in the European Union (EU), it may be transferred outside the EU to share with Sitara group companies, affiliates and/or trusted partners for processing consistent with this Privacy Policy. However, such transfers will be made only while appropriate protective measures exist to protect your transferred data (e.g. – contractual clauses with the respective entities with whom the data will be shared).

Third-Party Links and Content on Services

Our Services may link to third-party websites/applications and services that are outside our control. Further, SITAARA, its group companies, its affiliates, and their directors and employees ("SITAARA") accept no liability and will not be liable for any loss or damage arising directly or indirectly (including special, incidental or consequential, punitive, or exemplary loss, damage or expenses) from your use of any application or any site or inability to use by any party, howsoever arising, and including any loss, damage or expense arising from, but not limited to, any defect, error, interruption, imperfection, fault, mistake or inaccuracy with any online application, its Contents (material, data, money market movements, news items, etc.) or associated services, or due to unavailability of any application or any part thereof or any Contents or associated services even if SITAARA are advised of the possibility of such damages, losses or expenses.

Minors

To use the Site/Application you agree that you must be the minimum age (described in below paragraph below) or older.

The minimum age for these purposes shall be 18, however if local laws require that you must be older in order for SITAARA to lawfully provide the services in the Site/Application to you then that older age shall apply as the applicable minimum age.

In all jurisdictions outside the European Union, if you are under the age of 18 or the age of majority in your jurisdiction, you must use SITAARA under the supervision of your parent, legal guardian, or responsible adult.

Data Retention

Your personal data processed by SITAARA are kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed in line with legal, regulatory, contractual or statutory obligations as applicable.

At the expiry of such periods, your personal data will be deleted or archived to comply with legal/contractual retention obligations or in accordance with applicable statutory limitation periods.

Control over Your Information

We also provide you with the ability to control your Personal Data in accordance with the European Union's General Data Protection Regulation, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of your data.

You have the ability to update your profile and related Personal Data at any time. Also, you may review, update, correct, delete or object your Personal Data collected through the website/applications or service by emailing us at with privacy-Contact@sitaara.in

If you have privacy concerns regarding access to or the correction of your Personal Data, please contact us at the contact information mentioned within the section called "Data Privacy Issues and Whom to Contact" of this policy.

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data that you have provided to us.

While the majority of questions and issues related to access or requests can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within 30 days.

Log Data

We want to inform you that whenever you use our service, in case of an error in the app we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol("IP") address, device name, operating system version, the configuration of the app when utilizing our service, the time and date of your use of the service, and other statistics.

Cookies

Cookies are small files of information that a web server generates and sends to a web browser. Web browsers store the cookies they receive for a predetermined period of time, or for the length of a user's session on a website.

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our service.
- To provide the service on our behalf.
- To perform service-related services; or
- To assist us in analysing how our service is used.

Security and Confidentiality

SITAARA always makes sure to implement reasonable security practices and procedures (such as managerial, operational, physical, and technical) for the purpose of protection and safeguarding of your personal data as the same is having importance to SITAARA. At SITAARA, we are strongly committed to protecting the personal and financial data that you submit to us.

SITAARA shall ensure to safeguard the security and confidentiality of any data you share with us. Any of your personally identifiable data obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your Personal Data, SITAARA cannot warrant the security of any data you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your Personal Data is done at your own risk.

Transactions on the Website are secure and protected. Any information entered by the User when transacting on the Website is encrypted to protect the User against unintentional disclosure to third parties. The User's credit and debit card information is not received, stored by, or retained by the Company / Website in any manner. This information is supplied by the User directly to the relevant payment gateway, which is authorized to handle the information provided, and is compliant with the regulations and requirements of various banks and institutions and payment franchisees that it is associated with.

Lastly, you are requested to help us protect your data privacy by maintaining the secrecy of the username and password you use for any of our Services.

Social Media

SITAARA operates channels, pages, and accounts on some social media sites to inform, assist and engage with customers. SITAARA monitors and records comments and posts made on these channels about SITAARA in order to improve its products and services.

Please note that you must not communicate to SITAARA through such social media sites the following information:

Sensitive personal data including (i) special categories of personal data meaning any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and (ii) other sensitive personal data such as criminal convictions and offences and national identification number ;

-Excessive, inappropriate, offensive, or insulting information towards individuals.

SITAARA is not responsible for any information posted on those sites other than the information posted by its employees on its behalf. SITAARA is only responsible for its own use of the personal data received through such sites.

Consent

Consent is often referred to as an individual's choice to "opt-in" to or "opt-out" of the use of their Personal Data and is usually obtained by a "checkbox" or signature confirming the individual understands and agrees to the processing of their Personal Data. At times, express written consent from you may be required based on the data processing activity.

Whenever required, we take consent from you prior to:

- Collecting, using, or processing your Personal Data, including sensitive personal data, in certain ways or sharing your Personal Data with any third party (sensitive personal data is data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation)
- Transferring your Personal Data outside of your country of residence.
- Using or placing web cookies on your computer or other electronic devices.

Should You Want To Opt Out?

If we possess your contact information, we may want to keep you posted about our products, services, and events, through email. Should you prefer not to keep up to date with SITAARA news and latest information on services and receive such marketing materials, please send an email to unsubscribe- Contact@sitaara.in

However, such withholding of data or withdrawal of consent may result in us not being able to provide services and facilities and we reserve its right to take appropriate action with respect to any obligations or in relation to any contract under which such Personal Data was sought.

We will update your preferences as soon as reasonably practicable. However, do note, if you opt out of our emailing list, as described here, we may not be able to remove your Personal Data from all databases of SITAARA or other 3rd parties. For that, you would need to raise a request to erase your data as mentioned in the above section (control over your data).

Disclaimer

SITAARA shall not be liable for any loss or damage sustained by reason of disclosure (inadvertent or otherwise) of any data concerning the user's account and / or data relating to or regarding online transactions using credit cards / debit cards and / or their verification process and particulars nor for any error, omission or inaccuracy with respect to any data so disclosed and used whether or not in pursuance of a legal process or otherwise. SITAARA does not store any Credit Debit card details. Any other personal and sensitive Personal Data shared by you, which is not asked by SITAARA during registration, either mandatory or optional; accounts to wilful and intentional furnishing; and SITAARA will not be liable for breach of such data.

No contractual obligation

Please note that this Privacy Policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

Intellectual Property Rights

Please note that SITAARA retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all information provided on or via this web site/applications (including all texts, graphics, and logos).

Changes to this Privacy Policy

SITAARA reserves the right to change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested

to review the Privacy Policy periodically, to make sure that you are aware of any such changes. This Privacy Policy shall apply uniformly to SITAARA website and SITAARA applications or any other media used by SITAARA for its Services. Any changes or updates will be effective immediately upon posting the same on our web site at www.SITAARA.in

Data Privacy Issues and Whom to Contact

If you have any questions, comments, or concerns about this Privacy Policy or about how we handle your Personal Data, please get in touch with us at privacy-Contact@sitaara.in

Contact Information

Questions or comments concerning this Policy should be directed to Company via email as follows:

Chief Technology Officer

SITAARA Housing Finance Limited

2nd Floor, Shree Sawan Knowledge Park, D-507

TTC Industrial Area, MIDC Industrial Area, Turbhe, Navi Mumbai - Maharashtra - 400705 – India.

contact@sitaara.in

References

- Information Technology Governance, Risk, Controls and Assurance Practices November 7, 2023