



# Grow Money Capital Private Limited

(Formerly Known as Eclear Leasing & Finance Private Limited)

## **PRIVACY POLICY**

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## 1. BACKGROUND

This Privacy Policy framed in light of Section 43A of the Information Technology Act, 2000 read with Rule 4 of the Information Technology (Reasonable Security Practices & Procedures & Sensitive Personal Data or Information) Rules 2011, which requires Grow Money Capital Private Limited (hereinafter referred to as ("**GMCP**L") to provide policy for collects, receives, possess, stores, deals, handle or storage and disclosure of information.

## 2. PURPOSE

The purpose of this policy is to maintain the privacy of and protect the personal information of customers, employees, contractors, vendors, and business partners of GMCP L and collect and ensure compliance with laws and regulations applicable to GMCP L.

"**GMCP**L" intends to protect the privacy of its users and members on its site and maintain the privacy of the data provided by them to GMCP L from time to time and strongly committed to protecting the personal information, including but not restricted to, Sensitive Personal and Financial Information that customer submits to us and we would endeavor to protect it from unauthorized use.

Information collected offline or through channels other than this website do not fall under the purview of this Privacy Policy.

## 3. DEFINITION

"We", "our" "us" and "GMCP L" refer to "**Grow Money Capital Private Limited**"

"Site" refers to the website, mobile site, and the application that we provide and which includes a link to our Online Privacy Policy.

"You" or "your" refers to anyone who visits, accesses, browses or uses the GMCP L website at <https://growmoneycapital.com/> or obtains our services through our website.

**Personal Information:** means 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.

**Sensitive Personal and Financial Information:** means such personal information that is otherwise not available to anyone except the customer, such as password, financial information, sexual orientation, medical records, and physical, physiological, and mental health condition. Such information is generally not available in the public domain.

## 4. SCOPE

The "**GMCP**L" or any person who on behalf of "**GMCP**L" collects, receives, possess, stores, deals or handle information of provider of information, should adhere to privacy policy for handling of or dealing in personal information including sensitive personal data or information and ensure that the same are available for view by such providers of information who has provided such information under a lawful contract. Such policy should be published on site of the "**GMCP**L".

This policy is applicable to all **GMCPL** employees, contractors, vendors, customers, and business partners who may receive personal information, have access to personal information collected or processed, or who provide information to the organization.

All employees of **GMCPL** are expected to support the privacy policy and principles when they collect and/or handle personal information or are involved in the process of maintaining or disposing of personal information. This policy provides the information to successfully meet the organization's commitment to data privacy.

As per the **GMCPL** business process, personally identifiable information (PII) is collected/stored in the following areas:

1. Cloud-based Data Center of our service provider.
2. [www.growmonwycapital.com](http://www.growmonwycapital.com)

## **5. COLLECTION OF INFORMATION**

Personal information may be collected online or offline. Regardless of the collection method, the same privacy protection shall apply to all personal information.

- Personal information shall not be collected unless either of the following is fulfilled:
  - The data subject has provided valid, informed, and free consent;
  - Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering a contract;
  - Processing is necessary for compliance with the organization's legal obligation;
  - Processing is necessary in order to protect the vital interests of the data subject;
  - Processing is necessary for the performance of a task carried out in the public interest
- Data subjects shall not be required to provide more personal information than is necessary for the provision of the product or service that data subject has requested or authorized. If any data not needed for providing a service or product is requested, such fields shall be clearly labeled as optional. Collection of personal information shall be avoided or limited when reasonably possible.
- Personal information shall be de-identified when the purposes of data collection can be achieved without personally identifiable information, at a reasonable cost.
- When using vendors to collect personal information on the behalf of GMCPL, it shall ensure that the vendors comply with the privacy requirements of GMCPL as defined in this policy.

- GMCPL shall at minimum, annually review and monitor the information collected, the consent obtained and the contract agreement identifying the purpose.
- Respective department/function shall obtain approval from Board Members before adopting the new methods for collecting personal information electronically.
- GMCPL shall review the privacy policies and collection methods of Third Parties before accepting personal information from Third- Party data sources.

## **6. USE, RETENTION AND DISPOSAL**

1. Personal information may only be used for the purposes identified in the contract agreements and only if the data subject has given consent.

Information collected will be used in various ways to:

- a. To do the customer due diligence in accordance with KYC Direction 2016.
  - b. To facilitate credit facility as borrower applied for.
  - c. To do the credit underwriting for sanction of credit facility.
  - d. To do the ongoing monitoring.
2. Personal information shall be retained for as long as necessary for business purposes identified in the contract agreements at the time of collection or subsequently authorized by the data subjects.
  3. When the use of personal information is no longer necessary for business purposes, a method shall be in place to ensure that the information is destroyed in a manner sufficient to prevent unauthorized access to that information or is de-identified in a manner sufficient to make the data non-personally identifiable.
  4. GMCPL shall have a documented process to communicate changes in retention periods of personal information required by the business to the data subjects who are authorized to request those changes.
  5. Personal information shall be erased if the storage violates any of the data protection rules or if knowledge of the data is no longer required by GMCPL or for the benefit of the data subject.

## **7. SHARING AND TRANSFER OF INFORMATION**

Data Subject shall be informed in the Contract agreement, if personal information shall be disclosed to Third Parties / partner firms, and it shall be disclosed only for the purposes described in the contract agreements and for which the data subject has provided consent.

- Personal information of data subjects may be disclosed to the Third Parties only for reasons consistent with the purposes identified in the contract agreements or other purposes authorized by law.

- GMCPL shall notify the data subjects prior to disclosing personal information to Third Parties/ partner firms for purposes not previously identified in the contract agreements.
- GMCPL shall communicate the privacy practices, procedures, and requirements for data privacy and protection to the Third Parties.
- The Third Parties shall sign an NDA (Non-Disclosure Agreement) with GMCPL before any personal information is disclosed to the Third Parties partner firms. The NDA shall include the terms on non-disclosure of Personally identifiable information (PII).

## 8. SECURITY OF INFORMATION

Information security policy and procedures shall be documented and implemented to ensure reasonable security for personal information collected, stored, used, transferred, and disposed of by **GMCPL**

1. GMCPL shall establish procedures that maintain the logical and physical security of personal information.
2. GMCPL shall be framed board-approved business continuity and disaster recovery policy to ensure the protection of personal information against accidental disclosure due to natural disasters and environmental hazards.
3. Incident response protocols are established and maintained in order to deal with incidents concerning personal data or privacy practices.
4. Information asset labelling and handling guidelines shall include controls specific to the storage, retention and transfer of personal information.

## 9. COOKIES AND WEB BEACONS

Like any other website, **GMCPL** collects certain information from the user's browser using small data files called "**cookies**". These cookies enable to store information including visitor preferences, IP addresses, passwords, and allow visitors to secure move to different website pages having to re- enter password information. This information is used to customize our web page content and optimize user experience based on the visitor's browser type and/or other such information.

Any information collected is stored in secured cloud data centers protected by a variety of access controls and is treated as confidential information by "**GMCPL**"

The web pages of the website contain electronic images known as "web beacons" (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyze how the website is used. Web beacons may also be used in some of **GMCPL** emails to so as to know which emails and links recipients have opened, allowing it to gauge the effectiveness of its customer communications and marketing campaigns.

## **10. LINK TO THIRD PARTY WEBSITE**

Our site includes links to other websites whose privacy practices may differ from those of **GMCP**L. The inclusion of a link does not imply any endorsement by **GMCP**L of the third-party website, the website's provider, or the information on the third-party website. If the users submit personal information to any of those websites, such information is governed by the privacy policies of such third-party websites and **GMCP**L disclaims all responsibility or liability with respect to these policies or the websites. The users are encouraged to carefully read the privacy policy of any website that they visit.

## **11. CHILDREN'S INFORMATION**

Another part of our priority is to ensure protection for children while using the internet. We encourage parents and guardians of children to observe and participate in monitoring and/or guiding their online activities. **GMCP**L will never knowingly collect any Personal Identifiable Information from children below the age of 13. If you think that your child has divulged any such information on our website, we strongly urge you to contact us immediately. We assure you of prompt action in removing any such information available in our records.

## **12. CONSENT**

By using our site, you hereby provide consent that you agree and consent to the collection, transfer, use, storage, disclosure, and sharing of your information as described and collected by us in accordance with this Policy. If you do not agree with the Policy, please do not use or access our site.

## **13. GENERAL**

Any change due to legislative amendment or enhancement of functionality or in the content of the site we may make changes in the privacy policy and changes will be applicable only on a prospective basis so we recommend you to review this page periodically to know about the changes.

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.

## **14. DISCLAIMER**

All the information on our website is published in good faith and for general information purposes only. **GMCP**L does not make any warranties about the completeness, reliability, and accuracy of this information. Any action you take upon the information you find on this website is strictly at your own risk. We will not be liable for any losses and/or damages in connection with the use of our site.

From our site, you can visit other sites by following hyperlinks to such external sites. While we strive to provide only quality links to useful and ethical websites, we have no control over the content and nature of these sites. These links to other websites do not imply a recommendation for all the content found on these sites. Site owners and content may change without notice and may occur before we have the opportunity to remove a link that may have gone 'bad'.

Please be also aware that when you leave our website, other sites may have different privacy policies and terms that are beyond our control. Please be sure to check the Privacy Policies of these sites as well as their "Terms of Service" before engaging in any business or uploading any information.

#### **15. REVIEW OF THE POLICY**

The Policy should be subjected to an annual review by the management and modifications, if any warranted, should be taken up for the approval of the Board. If there are any amendments in the regulations, revision in the policy should be staged for Board's approval in the immediately ensuing Board Meeting, after the amendments are notified by the regulation.