ISF Limited
PRIVACY POLICY

1. Introduction

ISF Limited is a Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India (RBI) under Registration No. **B-14.00761**, and incorporated under the Companies Act, 1956 (CIN: L74899DL1988PLC076648). We are committed to protecting the privacy and security of the personal data of our customers, applicants and other individuals who interact with us (collectively, "you" or "User").

This Privacy Policy ("Policy") describes how we collect, use, process, store, share, and protect your personal data when you apply for or avail our financial products and services, including but not limited to loans, credit facilities, and related financial services.

This Policy is framed in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Digital Personal Data Protection Act, 2023 ("DPDP Act") and rules made thereunder, applicable Master Directions and guidelines issued by the RBI for NBFCs (including the Fair Practices Code and Master Direction on IT Governance, Risk, Controls and Assurance Practices), and other applicable laws of India, as amended from time to time.

You are advised to carefully read the Privacy Policy before using this or any other platform, application or channels or communicating with us or sharing information/data. ISF limited will not be liable / responsible for any breach of privacy owing to User's negligence

2. Scope and Applicability

This Policy applies to all personal data collected by us, whether obtained directly from you, through our Platform, from third parties such as credit information companies, KYC registration agencies, business partners, and correspondents, or generated in the course of our relationship with you. This Policy applies to prospective customers, existing customers, guarantors, co-applicants, authorized representatives, and visitors to our Platform.

This Policy does not apply to any third-party websites, applications, or services that may be linked to or accessible through our Platform. We encourage you to review the privacy policies of any third-party services before providing them with your personal data.

3. Definitions

- **"Personal Data"** means any data about an individual who is identifiable by or in relation to such data.
- **"Sensitive Personal Data"** includes financial information such as bank account or card details, biometric data, and any other category classified as sensitive under applicable law.
- **"Processing"** means any operation performed on personal data, including collection, recording, storage, use, disclosure, retrieval, alignment, restriction, erasure, or destruction.
- **"Data Principal"** means the individual to whom the personal data relates.
- "**Data Fiduciary**" means the entity that determines the purpose and means of processing personal data, which in this context is the Company.

4. Information We Collect

4.1 Information You Provide Directly

- Identity information: full name, date of birth, gender, photograph, signature, and government-issued identity documents (such as PAN, Aadhaar, passport, voter ID, or driving licence).
- Contact information: residential address, permanent address, email address, and mobile/telephone numbers.
- Financial information: income details, bank account and statement details, credit and debit card details, tax returns, employment and business information, existing loan or credit facility details, and repayment history.
- KYC and onboarding information: KYC documents, video KYC recordings, and information required for regulatory compliance under the Prevention of Money Laundering Act, 2002 and RBI's Master Direction on KYC.

- Application information: details submitted in loan or product application forms, guarantor and co-applicant details, and supporting documents.
- Communication information: records of correspondence, customer service interactions, complaints, and feedback.

4.2 Information Collected Automatically

- Device and technical information: IP address, device identifiers, browser type, operating system, and mobile network information.
- Usage information: pages viewed, time spent on the Platform, clickstream data, and app usage patterns, collected through cookies, SDKs, and similar tracking technologies.
- Location information: approximate or precise geolocation, where permitted by you, for fraud prevention and service delivery.

4.3 Information from Third Parties

- Credit information from Credit Information Companies (such as CIBIL, Experian, Equifax, or CRIF High Mark) and credit bureaus, as permitted under the Credit Information Companies (Regulation) Act, 2005.
- Information from KYC Registration Agencies (KRAs), Central KYC Registry, and Aadhaar-based authentication services (with your consent, where applicable).
- Information from business correspondents, sourcing partners, digital lending platforms, and co-lending partners involved in the loan origination or servicing process.
- Publicly available information and information from fraud-prevention or risk-assessment databases.

5. Purpose of Collection and Use of Information

We collect and process your personal data for the following purposes:

- To verify your identity and conduct KYC and due diligence in accordance with RBI and other regulatory requirements.
- To assess creditworthiness, process loan or credit applications, and make lending decisions, including through credit scoring and underwriting models.
- To create and service your account, disburse loans, process repayments, and manage the ongoing customer relationship.
- To communicate with you regarding your application, account, transactions, dues, and service updates through SMS, email, calls, WhatsApp, or push notifications.
- To comply with legal and regulatory obligations, including reporting to credit information companies, the RBI, the Financial Intelligence Unit-India, tax authorities, and other statutory or governmental authorities.
- To detect, prevent, and investigate fraud, money laundering, or other illegal activities.
- To improve our products, services, Platform functionality, and customer experience, including through analytics.
- To offer you other products and services that may be of interest to you, subject to your consent where required (including for marketing communications).
- To recover dues, enforce contractual rights, and pursue legal remedies in case of default.
- For internal audit, risk management, grievance redressal, and record-keeping purposes.

6. Sharing and Disclosure of Information

We may share your personal data with the following categories of recipients, strictly on a need-to-know basis and subject to appropriate safeguards:

- Credit Information Companies, in compliance with the Credit Information Companies (Regulation) Act, 2005, for credit reporting purposes.
- Regulatory and statutory authorities, including the RBI, courts, tribunals, law enforcement agencies, and other government bodies, where required by law or in response to valid legal process.
- Group entities, co-lending partners, business correspondents, collection agencies, and third-party service providers who assist us in loan origination, servicing, collections, verification, and customer support, under contractual confidentiality obligations.
- Professional advisors such as auditors, legal counsel, and consultants, on a confidential basis.
- Payment gateways, banks, and financial institutions for processing disbursements and repayments.

- Prospective assignees or acquirers in connection with any merger, acquisition, restructuring, or sale of assets/portfolio, subject to confidentiality obligations.

We do not sell your personal data to third parties for their independent marketing purposes. Any sharing of information for cross-selling or promotional purposes will be undertaken only with your consent, where required under applicable law.

7. Data Storage, Security, and Retention

We implement reasonable security practices and procedures, including administrative, technical, and physical safeguards such as encryption, access controls, firewalls, and secure data centres, to protect your personal data against unauthorized access, alteration, disclosure, or destruction, in line with the IT (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

Your personal data is primarily stored on servers located in India. We retain personal data for as long as necessary to fulfil the purposes outlined in this Policy, to comply with statutory retention requirements prescribed by the RBI and other applicable laws (including record maintenance requirements under KYC and anti-money laundering regulations), and to resolve disputes or enforce our legal agreements. Upon expiry of the applicable retention period, we will delete or anonymize your personal data in accordance with our data retention and disposal procedures.

8. Cookies and Tracking Technologies

Our website and mobile application may use cookies, web beacons, SDKs, and similar tracking technologies to enhance user experience, remember preferences, conduct analytics, and support fraud prevention. You may control or disable cookies through your browser or device settings; however, doing so may affect certain functionalities of the Platform.

9. Consent and Marketing Communications

By submitting your personal data, you consent to its collection and processing in accordance with this Policy. Where required by law, we will obtain your explicit consent, including for sharing information with credit information companies, use of Aadhaar-based authentication, or for sending promotional/marketing communications. You may opt out of receiving marketing communications at any time by writing to us or using the unsubscribe/opt-out mechanism provided in such communications, without affecting our ability to send you transactional or service-related communications.

10. Third-Party Links

Our Platform may contain links to third-party websites or services that are not owned or controlled by us. This Policy does not apply to such third-party platforms, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party website you visit.

11. Changes to this Policy

We may update this Policy periodically to reflect changes in our practices, technology, legal, or regulatory requirements. The revised Policy will be posted on our Platform along with the updated "Last Updated" date. We encourage you to review this Policy periodically. Your continued use of our Platform or services after any modification constitutes your acceptance of the revised Policy.

12. Governing Law and Jurisdiction

This Policy shall be governed by and construed in accordance with the laws of India. Any disputes arising out of or in connection with this Policy shall be subject to the exclusive jurisdiction of the competent courts at New Delhi.

13. Grievance Redressal

In case of any grievances, Customers may reach out to the Compliance Officer of the Company. The Compliance Officer details are available on the Website of the Company under https://isflimited.in/Investor-Contact-Grievance-Queries.html