

Client Data Security Policy

CDL Financial Services Private Limited

Registered Office:

D-12, Ground Floor, Kirti Nagar, New Delhi-110015
CIN NO: U74899DL1994PTC057158

Policy Name	Client Data Security Policy	
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1. Introduction

CDL Financial Services Private Limited (CDLFS) is a Non-Banking Financial Company having valid Certificate of Registration with Reserve Bank of India vide registration No. 14.00457 on 12th March, 1998 under current RBI classification as NBFC – Non-Deposit taking Company.

2. Definitions

“Personal information” (PI) 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 the Company, is capable of identifying such person.

“Sensitive personal data or information” (SPDI) of a person means such personal information which consists of information relating to:

- Password,
- financial information such as Bank account or credit card or debit card or other payment instrument details;
- physical, physiological and mental health condition;
- medical records & history;
- Biometric information;
- Any detail relating to the above clauses as provided to body corporate for providing service, for processing, stored or processed under lawful contract or otherwise.

“Data Principal” refers to the individual to whom the personal data relates.

“Processing” includes collection, recording, organization, storage, use, disclosure, sharing, or erasure of personal data.

Provided that, any information that is freely available or accessible in public domain or furnished under any law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this policy.

3. Applicability of the Policy

This Policy is applicable to the personal information and sensitive personal data or information collected by the company or its affiliates directly from the customer or through the Company’s online portals, mobile apps and electronic communications as also any information collected by the Company’s server from the customer’s browser.

4. Purpose of Collection and Use of Personal Information (PI) / Sensitive Personal Data or Information (SPDI)

The Company collects and processes personal data only for **lawful and specified purposes**, including:

- Customer onboarding and KYC verification
- Credit assessment and underwriting
- Loan disbursement, servicing, and recovery

- Reporting to credit bureaus and regulators
- Customer support and grievance handling

The Company shall ensure **purpose limitation** and shall not process personal data beyond the stated purposes without obtaining fresh consent.

The Company shall not use personal data for **marketing or cross-selling** without obtaining **separate and explicit consent**.

The responsibility for the accuracy and authenticity of the personal data provided rests with the customer. The Company shall not be liable for any incorrect or misleading information furnished by the Data Principal.

5. Third-Party and Vendor Management

The Company engages third-party service providers for various operational purposes. It ensures that such vendors process personal data strictly in accordance with the Company's instructions and applicable laws. All third parties are required to enter into appropriate agreements that mandate confidentiality, data protection obligations, and security safeguards.

6. Notice of Change

The Company reserves the right to amend or update this Policy from time to time to reflect changes in legal, regulatory, or business requirements. Any such changes shall be published on the Company's website and shall become effective upon publication.

7. Limitation of Liability

The Company shall not be liable for any loss or damage arising from incorrect or incomplete personal data provided by the Data Principal, or for any breach caused by factors beyond the reasonable control of the Company. The Company shall also not be responsible for information that is publicly available or disclosed in accordance with applicable law.

8. Disclosure of Personal Information

The personal information collected by the Company shall not be disclosed to any other organization except:

- a. where the disclosure has been agreed in a written contract or otherwise between the Company and the customer;
- b. where the Company is required to disclose the personal information to an affiliate / third party / Service provider on a need-to-know basis, for providing services / related activities, provided that in such case the Company shall inform such affiliate / third party / service provider of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of the Company.
- c. To statutory and regulatory authorities as mandated by RBI and Government Authorities of India.

9. Data Minimisation and Accuracy

The Company follows the principle of data minimisation and collects only such personal data as is necessary for the purposes identified. Reasonable steps are taken to ensure that the data collected is accurate, complete, and kept up to date. Customers are encouraged to promptly notify the Company of any changes or inaccuracies in their personal data.

10. Data Retention and Deletion

The Company retains personal data only for as long as it is necessary to fulfill the purposes for which it was collected or as required under applicable laws and regulatory guidelines, including those prescribed by the Reserve Bank of India.

Upon completion of the purpose or expiry of the retention period, the Company shall securely delete, destroy, or anonymize the personal data in a manner that prevents unauthorized access or misuse. Where retention is required for legal or regulatory purposes, the data shall be retained only to the extent necessary.

11. Rights of Data Principals

The Company recognizes and respects the rights of Data Principals under applicable laws. Individuals have the right to request access to their personal data, seek correction or updating of inaccurate data, withdraw consent for processing, and request erasure of personal data, subject to legal and regulatory limitations.

The Company shall establish mechanisms to enable the exercise of these rights in a simple and accessible manner. Requests from Data Principals shall be processed within a reasonable timeframe in accordance with applicable law. The Data Principal will approach the customer care and they will internally escalate the matter to respective departments for resolution.

12. Reasonable Security Practices and Procedures

The security of personal information is a priority and is protected by maintaining physical, electronic and procedural safeguards that meet applicable laws. The Company shall take reasonable steps and measures to protect the security of the customer's personal information

from misuse and loss, un-authorized access, modification or disclosure. The Company maintains its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. The Company ensures that its employees and affiliates respect the confidentiality of any personal information held by the Company.

13. Notice of Change

The Company may, from time to time, change this, Policy.

14. Cookie Policy

The Company's digital platforms may use various third-party analytical tools. These tools may use cookies which are downloaded to the customer's device when the customer visits a website in order to provide a personalized browsing experience. Cookies are used for other purposes like remembering the customer's preferences & settings, provide personalized browsing experience and analyse site operations. These cookies collect information about how users use a website. All information collected by third party cookies is aggregated and anonymous. By using the Company's website, the user agrees that these types of cookies can be placed on his/her device. User is free to disable/delete these cookies by changing his/her device / browser settings. The Company is not responsible for cookies placed in the device of user/s by any other website and information collected thereto.

15. Data Breach Management

In the event of any breach involving personal data, the Company shall take immediate steps to identify, contain, and mitigate the impact of such breach. The Company shall conduct an assessment of the risks associated with the breach and take appropriate remedial measures.

Where required under applicable law, the Company shall notify the relevant regulatory authorities and affected Data Principals in a timely manner. The Company shall maintain records of all data breaches and corrective actions taken.

16. Grievance Redressal Mechanism

The Company has established a grievance redressal mechanism to address concerns relating to the processing of personal data. Data Principals may raise complaints, queries, or requests regarding their data by contacting the designated Grievance Officer.

Details of the Grievance Officer are as follows:

Name: Mr. Pradeep

Email: Pradeep.verma@cdlfinserve.com

Address: Hall B, Ground Floor, Enkay Towers,
Udyog Vihar Phase V, Gurgaon 122016

All grievances shall be acknowledged and resolved within the timelines prescribed under applicable laws and internal policies.