

## PRIVACY POLICY

### 1. Who is covered under this policy?

This policy is applicable to the customer and User ("User"/ "You") who avail or intend to avail services from **Kinara Capital**, a registered trademark of Visage Holdings and Finance Private Limited, a Non-Banking Financial Company incorporated under the Companies Act, 1956, and registered with the Reserve Bank of India having its Registered Office at #50, 2<sup>nd</sup> Floor, 100 Feet Road, HAL 2<sup>nd</sup> Stage, Indiranagar, Bangalore-560038.

We at Kinara Capital, are committed to protecting the privacy and security of your personal information. Your privacy is important to us and maintaining your trust is of topmost priority in our service. This Privacy Policy explains how we collect, use, process and disclose information about you. By using our website/app and affiliated services, you consent to the terms of our privacy policy ("**Privacy Policy**") in addition to our Terms of Use. We encourage you to read this Privacy Policy regarding the collection, use, and disclosure of your information from time to time to keep yourself updated with the changes & updates that we make to this Policy. We recognize the importance of sensitive personal information and take reasonable measures to keep such information confidential. Information provided by users or customers will only be used/evaluated for the purpose of servicing you with Kinara Capital's products or services.

This Privacy Policy describes our privacy practices for our website, [www.kinaracapital.com](http://www.kinaracapital.com); the myKinara Mobile and web applications, and other online applications, products and services that are linked to us and owned and operated by Kinara Capital. This policy has been published in compliance with the Information Technology Act, 2000 read with Information Technology (Intermediaries guidelines) Rules, 2011 and Information Technology (Reasonable Security practices and procedures and sensitive personal data or information) Rules, 2011.

### 2. Information covered by this policy

This policy seeks to cover all such information that we collect from our users and/or that you provide us as mentioned below:

- Any personal/sensitive personal information that the users provide to Kinara Capital by filling in forms in the mobile app or web for the purpose of loan application or customer service such as name (First Name, Middle name, Last name), KYC documents such as PAN card, Aadhaar, Voter ID etc., date of birth, e-mail address, gender, mobile number, location of the user, bank statements etc. provided to Kinara Capital.
- Any information that users provide by directly writing to Kinara Capital or over the telephone.
- Any information that users provide to Kinara Capital through its similar online channels including but not limited to chatbot, WhatsApp, SMS, etc.
- Any information that may be collected by Kinara Capital from the User's browser or mobile app including any information, which may or may not be personally identifiable and/or traffic information and/or any information which may be collected by Kinara Capital, its affiliates/agents/agencies, including our server from the User's browser("Information").

- Any information that is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Information for the purposes of this Policy.
- Following the services availed by You from time to time, we may explicitly seek additional information including bank details, payment information, credit/debit card details / UPI information and any other governmental identification numbers or documents. You may choose to provide such information if you wish to use the services provided by our App/website/customer service channels for our products on the digital platforms.
- Kinara Capital may have a presence on social networking websites including but not limited to LinkedIn, Facebook, Twitter, Instagram, YouTube and blogs which are promotional and business initiatives to connect to a larger group of people. The domain links contained therein may either direct you to our Website or request your participation by way of feedback, or suggestions.
- We will also maintain a record of the information you provide to us when using customer support services.

### **3. Information provided by the user and collected through Apps and websites:**

Kinara Capital may collect and use technical data and related information, including but not limited to, technical information about your device, system and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other services to you (if any) related to such Mobile Applications

When you use our myKinara Mobile Application, the Mobile Application may automatically collect and store some or all of the following information from your mobile device (“Mobile Device Information”), in addition to the Device Information, including without limitation:

- Preferred Language, Name, Business Name, Business-related details, Pin code, Email Mobile number, gender, residential/correspondence address, date of birth, marital status, email address, geo-location or Other contact information;
- KYC Documents, Bank Statements, Photograph;
- Bank account or other payment instrument details;
- Any other detail for providing services.

For accessing the above information for the purpose of customer service via your mobile device, the myKinara Mobile app will request device permissions such as camera access, and geo-location. In some scenarios, only with your express consent, we may access SMS, contacts and call logs in order to enable us to provide service.

We use Other Information for the purposes including but not limited to troubleshooting connection problems, administering the Website and the myKinara Web application, analyzing trends in the market, gathering demographic information, to ascertain how our visitors use our Website/Web application, including information relating to the frequency of visits to our Website/Web application, the average length of visits, pages viewed during a visit, ensuring compliance with the applicable law, cooperating with law enforcement activities, etc. This information is used to improve the Website content and performance.

The Information including but not limited to that the users or customers are likely to provide/we are likely to capture on our digital platforms are categorized below:

<b>Type of Information</b>	<b>Details of the Information Provided/Captured</b>
Location Information	Pin code, Geo tag, Property Information, Address, etc.
Personal Information	Name (Applicant, Co-applicant, Guarantor (If any) - All parties for the application)
	Email ID & Mobile number of all parties
	Gender & Date of Birth of all parties
	Address of Applicants & Business
Live Picture and Photographs and Videos	Photos of the loan applicants/co-applicant/guarantor, photos of property, business location, residence, etc.
Proof of Identity or Address	Pan Card/Driving License/Passport/VoterID/Aadhaar Card, and/or any other RBI accepted proof of identity/proof of Address/Signature Proof, etc.
Financial Information	Income/Turnover details, details of financial liabilities, Bank Name, Bank account details, Passbooks/Account statements, etc.
Business Documents	Proof of Business, Business License details including registration documents, GST or ITR filing details, Udyam registration details, Tax Certificates, etc.
Bureau Details	Credit Reports extracted through listed/partnered Bureaus registered under the Credit Information Companies (Regulation) Act, 2005
Technical Information Captured	Type of Device, Browser details, Internet service provider details, Operating System details, Geo tagging, Activities on the web, applications or URL's being used, IP address, Information from the transactional or promotional SMS or emails.

#### **4. Information we collect from Third parties/shared with the third parties:**

With your consent, we may share your basic personal information to the credit bureaus, for example, Transunion CIBIL, CRIF Highmark, Experian, and Equifax which are credit information companies registered under the Credit Information Companies (Regulation) Act, 2005 who are among our partners. You are requested to provide us with explicit consent to procure your credit information from the various credit bureaus as mentioned above to check if you meet the loan eligibility.

We may also use your information for fetching your KYC data from one or more KYC registries. Once you are onboarded, we may update or share your KYC data with KYC registries such as CKYC and CERSAI, and the transaction details with the credit bureaus mentioned above, which is a regulatory requirement.

Kinara Capital may also employ third-party service providers including Co-lending partners and individuals for the following:

- To facilitate our service
- To provide the service on our behalf
- To perform service-related functions or
- To assist us in analyzing how our service is being used

User is hereby informed that the third-party service provider/agent/agencies will have access to your Personal Information on a “need to know” basis to assist Kinara Capital in rendering services and are restricted from using the same for any other reason. The third-party service provider is obligated not to disclose or use the information for any other purpose. Kinara Capital follows Reserve Bank of India’s directions on managing risks and code of conduct in outsourcing of financial services by NBFCs, wherever a third-party partner is involved.

#### **5. How we use the information that we collect:**

Any information provided by you will be used for creating and updating your account and processing your transaction(s) or for any other purposes for which you have granted access to such information to us, based on your interaction with myKinara mobile App/web applications, chatbot, WhatsApp, SMS and Kinara Capital’s official Website as well as our Offline Loan Application and Support Processes.

We may use, store and process the information provided by you to:

- Improve the services offered through the myKinara App / web application and other digital platforms
- Create and maintain a trusted and safe environment on our website/applications owned by us
- Provide, personalize, measure and improve the performance of the products and services offered under our mobile, web applications and other digital platforms.

The information collected through different channels, allows us to collect statistics about our website/app usage and effectiveness, personalize your experience whilst you are on our website/app, as well as customize our interactions with you and enhance the scope of our Services.

Any Information provided by you will be used for the creation of a unique customer ID with Kinara Capital, for availing any further services with us. We may use the information collected to perform internal operations necessary to provide our services, including troubleshooting software bugs and operational problems, conducting data analysis, testing and research and monitoring and analyzing usage and activity trends. We process this personal information for these purposes given our legitimate interest in improving the services.

In order to expand the scope of our services or due to regulatory requirements, we may from time to time, seek additional information from you. Any such collection of additional information and documents shall be subject to an explicit & purpose-specific consent wherever applicable.

We may also contact you, via email/phone for any customer surveys for market research purposes, or marketing communications that we feel might interest you, or send any communication including any content of advertisements or other notifications.

We use the information we collect (including recordings of customer support calls) to assist you when you contact our customer care services to investigate and resolve your queries and monitor and improve our

customer support responses. Certain online transactions may involve us calling you. This may also involve online chats. Please be aware that it is our general practice to monitor and, in some cases, record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.

We intend to protect your personal information and maintain its accuracy as confirmed by you. We implement reasonable physical, administrative, and technical safeguards to help us protect your personal information from unauthorized access, use, and disclosure.

We blend security at multiple steps within our products with state-of-the-art technology to ensure our systems maintain strong security measures. We do not ask for any personal and sensitive information like credit card details, Net banking Passwords, CVV of cards, banking transaction OTP's etc.

## 6. Terms & Conditions:

- Kinara Capital respects the privacy of Users in accordance with applicable law/regulation that governs users' privacy and always strives to uphold the standards in protecting the same.
- All Information collected shall only be used to provide the User with the services incidental and/or ancillary to the business of Kinara Capital.
- Users hereby acknowledge and agree to have given consent to Kinara Capital to use such information for business purposes whatsoever including but not limited to sharing such Information with any entity forming a part of Kinara Capital and/or any other third-party agent/Agency rendering service to us. Users agree that Kinara Capital shall have every right to use the Information to initiate the dialogue with the user with respect to the various products, services and other allied and necessary requirements as may be deemed necessary by Kinara Capital.
- The Information shall not be shared with any external organisation unless the same is necessary to enable Kinara Capital to provide you services, meet legal and/or regulatory compliance requirement and/or to enable the compilation of a transaction, credit reporting, or the same is necessary or required pursuant to applicable norms or pursuant to the terms and conditions applicable to such Information as agreed with Kinara Capital.
- Kinara Capital will use the Information to improve the User experience on the site and make subsequent offers to the User on products which may be of interest to him/her.
- Kinara Capital's website uses cookies. Cookies are small data files that a website stores on your computer. Kinara Capital use persistent cookies which are permanently placed on your computer to store non-personal (Browser, ISP, OS, Clickstream information etc.) and profiling information (age, gender, income, etc.). While cookies have unique identification nos., personal information (name, a/c no, contact nos. etc.) shall not be stored on the cookies. Kinara Capital will use the information stored in the cookies to improve user/customer experience by throwing up relevant content where possible. Kinara Capital will also use the cookies to store User preferences to ease User navigation on the site. Kinara Capital may in the future implement encryption of the cookies.
- This website contains material owned or licensed by Kinara Capital. Reproduction of such material is strictly prohibited elsewhere. Any unauthorized use of the website is prohibited by users in compliance with Rule 3 of Information Technology (Intermediaries guidelines) Rules, 2011

- Use of this website and any dispute arising out of such use of the website is subject to the laws of India
- If users access the website from outside India, users do so at their own risk and are responsible for compliances with the laws of such jurisdiction.
- The digital App's or platforms are not intended for users under the age of 18 years. We do not knowingly collect any personal information from persons under the age of 18 years or market to or solicit information from anyone under the age of 18 years.

## **7. Data Safety/ Security:**

Kinara Capital, Website and apps ensures encryption of collected data in transit and stores it in a secure way. We may share some of this data in compliance with our legal obligations (such as anti-money laundering regulations). Our data retention policies are governed by regulatory bodies.

Kinara Capital intends to protect your personal information and maintain its accuracy as confirmed by you. Kinara Capital continuously strives to implement reasonable physical, administrative, and technical safeguards to protect your personal information from unauthorized access, use, and disclosure. But, remember that no method of transmission, whether in physical form or over the internet, or method of electronic storage is 100% secure and may be subjected to unintentional risks, due to reasons beyond our control.

Kinara Capital reserves the right to disclose information shared by you without your consent (express or implied) and without any liabilities to you when required or permitted by law and we have a good-faith belief that (i) such action is necessary to comply with an appropriate law enforcement investigation, current judicial proceeding, a court order or legal process served on us or (ii) to conform to the legal requirements, compliance/reporting to administrative and judicial authorities, as may be required (iii) protect and defend the rights or property of the website owners of Kinara Capital, or the users of Kinara Capital, (iv) person(s) or company (ies) who provide certain support services to us, or (v) person(s) or company (ies) who share certain responsibilities/obligations of Kinara Capital and (vi) to third parties/ service partners for providing you services offered by such third parties and service partners. Further, we reserve the right to disclose information shared by you without your consent with entities engaged in providing the credit scores or credit information related services like CIBIL, Highmark, Experian, Equifax etc.

## **8. Links to Other Sites:**

Our website may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that such external sites are not operated by us. Therefore, Kinara Capital strongly advises you to review the Privacy Terms of such external websites. Kinara Capital has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services. Under no circumstances shall we be deemed to control or guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, cookies, messages or other materials available on such platforms.

## 9. Responsibility of User:

User acknowledges the following:

- a) Kinara Capital and/or its employees/personnel/assigns will not contact the User directly for disclosure of any sensitive and personal information unless required for the purpose of providing users with products or services they have expressed interest in. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting you before disclosing any personal and sensitive personal data/information by reaching out to Kinara Capital's nearby branch office or official customer care number published on its website [www.kinaracapital.com](http://www.kinaracapital.com) before deciding to make any disclosure.
- b) User shall not hold Kinara Capital liable/responsible for any breach of privacy owing to your negligence and hereby waive off from making any claims/demands/compensation against Kinara Capital.
- c) User shall only use the official website/links of Kinara Capital for availing products/services by inputting the domain information on the address bar.
- d) User is completely aware about the potential risk of data/privacy breach and User hereby confirms that User shall be solely liable for any unauthorized disclosure/breach of personal/sensitive personal information, etc. and any direct/indirect losses suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal data/sensitive personal data (including but not limited to any passwords, financial information, account details, etc.) are not shared/stored/made accessible through:
  - i. any physical means with or without User's knowledge (disclosure to any person/third-party; etc.)

Or

- ii. any electronic means, by exercising the following precautions/safety measures:
  - User shall always check if "https" appears in any website's address bar before making any online transaction, to ensure that the webpage is encrypted;
  - User shall avoid using third party extensions, plug-ins or add-ons on the/your web browser, as it may result in the risk of tracking or stealing of my personal details;
  - User shall always type the information and not use the auto-fill option on web browser to prevent the risk of storage of my personal/sensitive personal information;
  - User shall not access darknet, unauthorized/suspicious websites, suspicious online platforms, downloading applications from unreliable sources. User shall ensure to disable cookies before accessing any domain/website, to ensure that User's personal information is not tracked by any third party, unless otherwise consciously permitted by user by accepting the same, for which, User alone will be responsible for the consequences thereof;
  - User shall not respond to any generic emails from an unknown/unidentified source;
  - User shall check the Privacy Policy of the website/application to know the type of information that may be collected from User and the manner in which it may be processed by the website/application before accepting/proceeding/transaction on any website/application;



- User shall always verify and install authentic web/mobile applications from reliable source on User's computer/laptop/tab/iPad/smart phone or any other electronic device;
- User shall NOT access any unidentified weblinks

We suggest you agree that you shall not engage in any activity of data scraping or data crawling on the Platform and usage of web crawling or web scrapping software for accessing the Platform would be considered to be an unauthorised access.

## 10. Changes to the Privacy Policy:

Kinara Capital may update our Privacy Terms from time to time. Thus, you are advised to review this page periodically for any changes. Kinara Capital will notify you of any changes by posting the new Privacy Terms on this page. These changes are effective immediately after they are posted on this page. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing or availing the Platform for availing the services. Your continued use of the Services following the posting of changes to this Privacy Policy will constitute Your consent and acceptance of those changes.

## 11. Contact Us:

If you have questions, concerns, or suggestions regarding our Privacy Policy, you may get in touch with us through various contact options displayed on <https://www.kinaracapital.com/contact-us/>.

In order to effectively address customer grievances, Kinara has introduced multiple channels of communication. A customer can raise a complaint or express their dissatisfaction on the company service through the below channels:

- Walk in to our Branch and speak to the Branch Manager
- Call us on our toll-free number 1800-103-2683 and speak to our customer care agent.
- Email us at [help@kinaracapital.com](mailto:help@kinaracapital.com)
- Raise a complaint on our website - [www.kinaracapital.com/contact-us/](http://www.kinaracapital.com/contact-us/)
- Send us letters to our registered address:
  - The Customer Grievance Redressal Officer  
# 50, 2<sup>nd</sup> floor, 100 feet road,  
HAL 2nd Stage, (Defence Colony),  
Indiranagar, Bengaluru, Karnataka – 560038.

For further details on our Grievance Redressal Policy, please go to <https://www.kinaracapital.com/customer-grievance-redressal-policy/>

## 12. Customer / User Consent:

By accessing our mobile application, Website and other related web pages, user expressly consent to Kinara Capital to collect, maintain, process the information provided, and also disclose the information in accordance with this privacy policy.