

We, at Easy Home Finance Limited (“EHFL” or “We”) understand Privacy and its value. Therefore, it is all the more important for us to make YOU (“You” or “Customer” or “User”), the User of the website www.easyhomefinance.in (the “Website”) and its associated mobile applications, EHFL (“Application”) (collectively, the “Platform”), understand the reason behind collection of your information and its usage and the manner in which we collect, use, store and share information about you (“Privacy Policy”). This Privacy Policy has been prepared in compliance with:

- Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021
- Other applicable acts, regulations and rules which requires the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information and all applicable laws, regulations, guidelines provided by applicable regulatory authorities including but not limited to the Reserve Bank of India, National Housing Bank & Insurance Regulatory and Development Authority of India

This Privacy Policy is incorporated into and at all times is subject to and is to be read in conjunction with the Terms of Use of the Platform.

A. CONSENT

1. You hereby expressly consent to provide the information that may be required in relation to the Services (as defined below) being rendered on the Platform by us. You acknowledge that we shall collect the information detailed under this Privacy Policy to facilitate lending & allied by partnering with various financial lenders, third parties, service providers, etc based on your request and requirement to avail such Services (“Services”).
2. EHFL will only be using the information for providing the Services to you.
3. In order to avail any Services being provided by EHFL by itself or in partnership with the lenders or other third parties it is important that **YOU READ, UNDERSTAND, ACKNOWLEDGE AND UNCONDITIONALLY AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY.**
4. **IF YOU DO NOT AGREE TO THIS POLICY OR ANY PART THEREOF, PLEASE DO NOT USE/ ACCESS/ DOWNLOAD/ INSTALL THE PLATFORM OR ANY PART THEREOF.**
5. For the users consenting to continue accessing the Platform and avail the Services, this Privacy Policy explains our policies and practices regarding the collection, use, storage and disclosure of Your information.

B. COLLECTION OF INFORMATION

The collection of information under this Privacy Policy are conducted for the following categories of services:

1. **Information for Lending Services:** Information collected by Platform for facilitation of Loans being disbursed by EHFL and its co-lending partners whose details are available in the MITC and Facility Agreements and who are registered with the Reserve Bank of India or National Housing Bank (“Co-Lending Partners”).
2. **Information for Allied Services:** Information collected by Platform while registering a User on the Platform or while providing Value Added Services (i.e. all services other than facilitation of loans).

B.1 Information we collect about you

In order to facilitate the Services, EHFL will be required to access, collect and share Personal Information with its co-lending partners that may be banks or NBFCs/HFCs registered with the Reserve Bank of India, National Housing Bank, Insurance Regulatory and Development Authority of India or any other third-party providing value added services in partnership with EHFL. In such cases, EHFL will share the information securely and ensure that all personal information recipients comply with confidentiality, fidelity and secrecy obligations and sign covenants in this regard. EHFL may make information available to third parties that are financial and non-financial companies, government agencies, courts, legal investigators, and other non-affiliated third parties as requested by You or Your authorized representative, or otherwise when required or permitted by law.

- i. **User Personal Information:** The data points we collect from You for both lending and non-lending services include, *inter alia*, your full name, email id, PAN, GST Network user id & password, address, mobile number, postal code. EHFL ensures that sensitive personal data such as Aadhaar, PAN, and financial information is securely transferred using encryption and stored in compliance with the IT Security Rules, with limited access granted only to authorized personnel.
- ii. **Social Account Information:** EHFL **may provide** you with the option to register using social accounts (Google or Facebook) to access the app and shall collect only such registered email id and user public profile information like name, email, ASID depending on the platform used by You to log-into the Application during registration/ sign in process in the Platform.

How we use this information: We may collect and store email id, name and address associated with that account for the purpose of verification and to pre-populate relevant fields in the course of Platform interface. However, we shall not collect / store account passwords.

- iii. **SMS Information:** EHFL collects, stores and monitors SMS information from your device.

How we use this information : Our Platform uses SMS read permission to access your financial and transaction SMS only to autofill and verify the OTP used to validate your mobile number when creating an account with EHFL - this provides you a seamless experience during that process. We also collect your SMS data to analyse the data around specific financial transactions for statistical analysis or for credit rating.

- iv. **Call logs and Contacts permission**

How we use this information: Our app uses the Contacts permission to simplify the loan application process by allowing users to easily share relevant loan information, referrals, or required documents with their contacts, such as co-applicants, guarantors, or loan agents. This feature ensures smooth communication and collaboration between all parties involved in the home loan process.

Our app accesses call logs to help users keep track of their interactions with loan officers, customer service representatives, or agents during the home loan application process. This feature ensures that important communication is logged, enabling users to easily review their call history and follow up on discussions related to their loan applications or inquiries.

- v. **Device Information and Installed Apps data:** We additionally collect certain device information provided herein for our lending and non-lending services. Information which the Application

collects, and its usage, depends on how you manage your privacy controls on your device.

(a) Device Information: When you install the Application, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the Application and explicitly seek permissions from You to get the required information from the device. Additionally, we also collect your Log information (via the domain server through which the User accesses the App Search queries, IP address, crashes, date etc for the purpose of improvising the Application functionality). In addition to the above, we also track and collect the data related to the performance of the Application and other diagnostic data for identifying and resolving any technical glitches that may be identified from such data and also for improving the overall functionality of the Application.

How we use the information: We collect information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behaviour, thereby allowing us to improve our products interaction, quality of services and provide an enhanced customized user experience to you. We further collect other identifiable information such as your transactions history on the Platform.

- vi. (b) Installed Application Data: We collect and transmit a list of specific installed applications' metadata information which includes the application name, package name, installed time, updated time, version name and version code of each installed application on your device. This data may be collected even when the app is closed or not in use. *How we use this information*: We use this information for your onboarding and Know Your Customer (KYC) purpose with your explicit consent.

(c) Location, Camera, Microphone Access: We will collect your device location and request camera and microphone access for facilitating lending services as well as providing any non-lending services only in accordance with applicable laws. *How we use this information*: We shall collect your device location information for verifying your address, for the KYC and onboarding process for the Services. We may request camera access to scan and capture the required KYC documents as per our requirements in accordance with applicable laws. We require microphone permissions to enable a two-way communication between our authorised agents and you for the purpose of performing and completing your Video KYC for authentication of KYC as per applicable laws. Your audio shall be recorded for regulatory purpose.

B.2 Information about you we collect from third parties

- i. EHFL shares data with third-party partners only under non-disclosure clauses forming a part of the master agreements with third party partners including co-lending partners ensuring confidentiality and compliance.
- ii. For making the Services available to you, we may collect credit information by obtaining specific authorisations from you (if required under applicable laws), from certain third parties such as credit bureaus or credit rating companies as your 'authorised representative' from time to time in accordance with applicable laws during the loan journey as may be required.

- iii. In order to facilitate credit products to you, we may receive certain information pertaining to document verification, repayment status etc from certain third parties including NSDL, payment gateway providers.
- iv. We may further collect your bank account numbers or UPI payment information to facilitate collection and repayment of loan payments.
- v. We shall only collect this information on a need basis strictly for the purpose of providing you with the Services. We collect this information as part of our lending requirements.

B. 3 Information you give us about you

- i. In due course of using our Services, you are required to submit data to enable our Services. We use this data to create your profile and provide you with the best available services. Mentioned below is some of the data we collect from you:
 - ii.
 - i. Data provided by you by filling in forms in the Application or on the Website.
 - ii. Data provided by corresponding with us (for example, by e-mail or chat).
 - iii. Data and information, you provide when you register to use the Website, download or register on our App, subscribe to any of our Services (such as applying for a loan), search for a Service, and when you report a problem with our App, our Services, or any of our Sites.
 - iv. Data including your name, address, gender, date of birth, e-mail address, phone number, username, password and other registration information.
 - v. PAN Card, Aadhaar Card, financial information such as employer name, monthly salary, bank account no., bank statements, credit information, GST information, copies of identification documents which are required for the onboarding of your application to avail the services.
 - vi. Data generated by your usage of our Platform.
 - vii. Contact details (i.e. the phone number) of the third-party individuals (including your relatives and friends) that are voluntarily added by you at the time of loan application.
 - iii. This data helps us create your profiles, complete mandatory KYC as per the requirements of regulator to offer you the Services, unlock and approve loans and provide you with customized support in case of issues. Please note that we do not store any data provided by you except for the basic information such as name, address, your contact details etc.
 - iv. Wherever possible, we indicate the mandatory and the optional fields. You always have the option to not provide any information by choosing not to use a particular service or feature on the Platform. While you can browse some sections of our Platform without being a registered member as mentioned above, certain activities (such as availing of loans on the Platform) require registration and for you to provide the above details.

C. Storage of Personal Information

- i. For the provision of lending Services, we shall only store basic personal information such as your name, your address, your contact information which are required to be stored for carrying out our lending and non-lending services. We ensure that every data or information that we collect from you is stored in servers located in India and the same is compliance with all the statutory/regulatory obligations.

D. Collection of Certain Non-Personal Information

- i. We automatically track certain information about you based upon your behaviour on our Platform. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users and improve our services. This information is compiled and analysed on an aggregated basis.
- ii. Cookies: Cookies are small data files that a website stores on Your computer. We will use cookies on our Website similar to other lending websites / apps and online marketplace websites / apps. Use of this information helps Us identify You in order to make our Website more user friendly. Most browsers will permit You to decline cookies but if You choose to do this it might affect service on some parts of Our Website.

E. PURPOSE OF COLLECTION

1. We shall use the information collected from you for facilitating the lending and non-lending Services for the following purposes as detailed below. We understand the importance of your information and ensure that it is used for the following intended purposes only.
2. The intended purpose of collecting information provided by you is to:
 - i. establish identity and verify the same;
 - ii. to facilitate your KYC as per instructions from regulator/s;
 - iii. troubleshoot problems, monitor, improve and administer our Platform;
 - iv. provide our service i.e. facilitating loans to You or providing our value-added services or non-lending services to you.
 - v. design and offer customized products and services offered by our third-party partners;
 - vi. analyse how the Platform is used, diagnose service or technical problems and maintain security;
 - vii. send communications notifications, information regarding the products or services requested by You or process queries and applications that You have made on the Platform;
 - viii. measure consumer interest and satisfaction in our products and services and manage Our relationship with You;
 - ix. marketing and promotional purposes including sending you promotional SMS, Email and WhatsApp and inform you about online and offline offers, products, services, and updates;
 - x. conduct data analysis in order to improve the Services / Products provided to the User;
 - xi. use the User information in order to comply with country laws and regulations;
 - xii. use the User information in other ways permitted by law to enable You to take financial services from us.

- xiii. resolve disputes and detect and protect us against suspicious or illegal activity, fraud and other criminal activity;
 - xiv. customize your experience and enforce our terms and conditions.
 - xv. the contact details (i.e. the phone number) of the third-party individuals (including your relatives and friends) that are voluntarily added by you at the time of loan application may be used for the purpose of establishing contact in case we are unable to contact you, including at the time of collection of instalments’.
3. We will use and retain only such basic personal information such as your name, contact information, address details and such other information which are necessary for the provision of Services and for such periods as necessary to provide You the Services on the Platform, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

F. DISCLOSURE TO THIRD PARTIES

1. We will share Your information only with our third parties including our regulated financial partners, vendors etc for facilitation of Services on the Platform.
2. We will share the information only in such manner as described below:
 - i. We disclose and share Your information with the financial service providers, banks or NBFCs, Insurance companies and our co-Lending Partners for facilitation of a loan or facility or line of credit or purchase of a product; marketing, ads tracking, campaigns etc.
 - ii. We share Your information with our third-party partners in order to conduct data analysis in order to serve You better and provide Services our Platform;
 - iii. We may disclose Your information, in order to enforce or apply our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of us, our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
 - iv. We will disclose the data / information provided by a user with other technology partners to track how the user interacts with the Platform on our behalf.
 - v. We and our affiliates may share Your information with another business entity should we (or our assets) merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business for continuity of business. Should such a transaction occur than any business entity (or the new combined entity) receiving any such information from us shall be bound by this Policy with respect to your information.
 - vi. We will disclose the information to our third-party technology or third-party data source providers; for purpose of analytics
 - vii. We will share Your information under a confidentiality agreement with the third parties and restrict use of the said information by third parties only for the purposes

detailed herein. We warrant that there will be no unauthorised disclosure of your information shared with third parties.

- viii. We shall disclose your KYC journey or any data with respect to the same to the relevant regulatory authorities as a part of our statutory audit process. Please note that your Aadhaar number shall never be disclosed.
3. We may share your personal information with the governmental authorities, quasi-governmental authorities, judicial authorities and quasi-judicial authorities if we are acting under any duty, request or order as part of our legal obligations and in accordance to the applicable laws. By accepting this Privacy Policy, you hereby provide your consent to disclose your personal information for such regulatory disclosure.
4. Any disclosure to third parties is subject to the following:
- i. If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request, we shall not seek your explicit consent however we shall reasonably endeavour to notify the same to you accordingly as the case may be as stated under subclause ;
 - ii. We shall share your information with third-party only on a need basis and only for the purpose stated hereunder, as per the applicable laws.
 - iii. We shall additionally seek express consent through a separate consent for at appropriate stages of data collection, if so, required under applicable laws.
 - iv. Usage of your information by such third parties is subject to their privacy policies. We share limited information with them, strictly to the extent required. We recommend you to have a look at the privacy policies of such third parties.
5. Updated List of entities with whom your information is shared can be assessed at www.easyhomefinance.in, and as below

Data / Type	Entity / Regulator w.e.f. 30 th September 2024	Other Regulations may be applicable
Telephone Number: SMS, OTP, Communication	Telecom Providers	TRAI Regulations
Telephone Number: Telephone Call / Recording	Telecom Providers	TRAI Regulations
Data as required under law Credit Bureau	CIC's	RBI's Master Direction on KYC (Know Your Customer) Guidelines, 2016.
PAN Card	Registry Provider	RBI's Master Direction on KYC (Know Your Customer) Guidelines, 2016.
Aadhar	Registry Provider, Regulator	Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016.
Name, Address Court & Criminal Records	Analytics Providers	-

Data as required under Reserve Bank of India Co-Lending Guidelines	Co Lending Partners	RBI/2020-21/63 FIDD.CO.Plan.BC.No.8/04.09.01/2020-21
Data as required under law Auditors	Auditors	Relevant codes of Institute of Chartered Accountants India, Registrar of Companies, Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023
Data as required under law Insurers	Registered Insurance Companies under IRDA	Insurance Regulatory and Development Authority of India Regulations, 2015 (Corporate Agents)

G. DATA RETENTION

1. We at EHFL promise to protect your personal data from unauthorized access, misuse, and disclosure using the right security measures based on the type of data and how we are processing the same. We retain information about you to provide a seamless experience, to contact you in case of support required and about your account, to detect, mitigate, prevent, and investigate fraudulent or illegal activities during the course of the Services. We retain your data for as long as necessary to provide you with our services. We may also retain and use your basic personal information inter alia as name, contact number, transactional details and address details as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements which shall always be in accordance with applicable laws.
2. Data related to loans and financial transactions will be retained as per RBI guidelines, which may require retention beyond service termination for regulatory and audit purposes.

H. CHANGES IN THIS PRIVACY POLICY

1. We reserve the right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. In case, any changes are made in the Privacy Policy, we shall update the same on the Platform. Once posted, those changes are effective immediately, unless stated otherwise. We encourage you to periodically review this page for the latest information on our privacy practices. Continued access or use of the Services constitute Your acceptance of the changes and the amended Privacy Policy.

I. SECURITY PRECAUTIONS

1. The Platform intends to protect your information and to maintain its accuracy as confirmed by you. We implement reasonable physical, administrative and technical safeguards to help us protect your information from unauthorized access, use and disclosure. For example, we encrypt all information when we transmit over the internet. We also require that our registered third-party service providers protect such information from unauthorized access, use and disclosure.
2. Our Platform has stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavour to safeguard and ensure the security of the information provided by you. We use Secure Sockets Layers (SSL) based encryption, for

the transmission of the information, which is currently the required level of encryption in India as per applicable law.

3. We blend security at multiple steps within our products with the state-of-the-art technology to ensure our systems maintain strong security measures and the overall data and privacy security design allow us to defend our systems ranging from low hanging issue up to sophisticated attacks.
4. We aim to protect from unauthorized access, alteration, disclosure or destruction of information we hold, including:
 - i. We use encryption to keep your data private while in transit;
 - ii. We offer security feature like an OTP verification to help you protect your account;
 - iii. We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;
 - iv. We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
 - v. Compliance & Cooperation with Regulations and applicable laws;
 - vi. We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.
 - vii. Data transfers;
 - viii. We ensure that Aadhaar number is not disclosed in any manner.
 - ix. When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

J. YOUR RIGHTS

1. **Modifying or rectifying your information:** In the event that any Personal Information provided by You is inaccurate, incomplete or outdated then You shall have the right to provide Us with the accurate, complete and up to date data and have Us rectify such data at Our end immediately. We urge You to ensure that You always provide Us with accurate and correct information/data to ensure Your use of Our Services is uninterrupted. In case of modification of Personal Information, Users will be required to furnish supporting documents relating to change in Personal Information for the purpose of verification by the Company.
2. **Your Privacy Controls:** You have certain choices regarding the information we collect and how it is used:
 - i. Your device may have controls that determine what information we collect. For example, you can modify permissions on your Android/iOS device or Browser to remove any permissions that may have been given. However, Platform does not provide a guarantee of Services if any such controls are exercised.
 - ii. Delete the App from your device

3. Withdrawal/Denial of consent: While consent for processing personal data can be withdrawn, EHFL must continue processing certain data to comply with RBI regulations for ongoing services until all financial obligations are fulfilled.
 - i. You acknowledge that the Platform has duly collected the information with your consent and you have the option to not provide such information, or deny consent for use of specific information or revoke the consent already given.
 - ii. However, any withdrawal of such personal information will not be permitted in case any Service availed by You is active. Where a consent has been withdrawn the Platform does not guarantee or be liable for providing such Service. You shall have the following rights pertaining to your information collected by us.
 - iii. Deny Consent: You shall have the right to deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the App delete/ forget the data. However, any such denial will not prejudice the right of the co-lending partners or insurance partners to retain any data in relation to the loans availed by you or by the non-lending service providers in relation to the non-lending services provided to you. Further, in case of a denial of a consent, the Platform does not provide a guarantee or will not be liable towards the continued facilitation of the Services if any such controls are exercised.
 - iv. Withdraw Consent: You may withdraw Your consent to contact You, for the continued collection, use or disclosure of Your information, at any time by mailing Us at privacy@easyhomefinance.in. However, Platform does not provide a guarantee of Services if any such controls are exercised. Further, if You have availed any loan facilities from us partner or any co-lending partner, EHFL and the co-lending partner shall have the right to continue processing Your information till such credit facility has been repaid in full, along with any interest and dues payable and/or for such period as may be allowed under applicable law. However, We, shall not retain Your data and information if it is no longer required by Us and there is no legal requirement to retain the same. Do note that multiple legal bases may exist in parallel, and We may still have to retain certain data and information at any time. Also, the information may still be used for execution of any outstanding or termination activity of any Lending or Non-lending Services.
 - v. Report an issue: You have a right to report a security incident to the Chief Grievance Redressal Officer (CGRO) (detailed mentioned hereinbelow). You are entitled to prevent unauthorised such usage of your information by our personnel/agents by informing us, within 10 days of being informed of the proposed use, that you do not wish to disclose such information. You can also exercise the right at any time by contacting us at cgro@easyhomefinance.in
4. Notwithstanding anything to the contrary stated above, the following are specific scenarios listed below which may have consequences to your withdrawal of consent:
 - i. Marketing and Communication: The consent for this information be withdrawn if You write an email to the email address
 - ii. Information/data removal may not be implemented for ongoing Services including loan, insurance policy or digital loan products.

K. GRIEVANCE REDRESSAL

You may make a request for deleting any information from the Platform at any stage upon making a request to us in the following manner:

The grievance redressal officer will acknowledge grievances within 48 hours and initiate resolution as per the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

a. Grievance Officer

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below for your reference:

Grievance Officer - Mr Siddharth Mehta

Easy Home Finance Limited

3rd Floor, Savoy Chambers, Linking Road, Santacruz (West), Mumbai- 400054

Email: cgro@easyhomefinance.in

Time: Monday – Friday (excluding national holidays) (10:00 - 18:00)