

# **GODREJ HOUSING FINANCE LIMITED**

## **Privacy Policy**

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Godrej Housing Finance Limited (hereinafter referred to as "GHFL"), a company incorporated under the provisions of Companies Act, 2013, having our registered office at Godrej One, Pirojshanagar, Vikhroli (East), Mumbai – 400079 and having corporate identity number U65100MH2018PLC315359, value your trust and respect your right to privacy.

### **General**

This Privacy Policy provides you with details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. If you do not agree to the terms of this Privacy Policy, do not further use or access GHFL website, GHFL applications or its digital assets (Website content/Journeys/ Applications/Mobile, tablet apps/Digital and SMS Communication).

For the purpose of this Privacy Policy, the term "You" or "User" shall mean any natural or legal person/entity including online and offline clients visiting this website and the term "We", "Us", "Our" shall mean GHFL along with its Subsidiaries.

Use of this Website/digital asset/communication signifies your acknowledgement and consent to this Privacy Policy. If, however, you object to Your Information being used, collected, stored, processed and transferred by GHFL in any way, please do not share your information on the Website or any Platform or with any representative of GHFL. If you would like to make a complaint about a possible breach of local privacy laws, please do so by calling us on 8657764527 or email at the following address: nodalofficer@godrejhf.com

This privacy statement is applicable to website and applications (mobile and hybrid, hereinafter referred to "applications") of GHFL. This Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, or television or any other media or computer resource or any other medium digital or otherwise to access our Services. It also applies to those who register on our website/applications in connection with use of our services, or whose data GHFL otherwise receives in connection with its services. It is important that you read the Privacy Policy carefully because whenever you use our website/applications, your personal data will be processed (if at all) in accordance with this Policy.

For purposes of this Policy, the term "representative" shall include employees, authorised agents of GHFL.

### **Personal Data and its collection**

Personal Data, means and includes, any data relating to a natural person and is capable of identifying such person ('data subject' here in referred as you/your') including but not limited to, name, address, mailing address, telephone number, email ID, PAN, LAN, bank account details including bank statements, linked to credit/debit payment instruments, information about your mobile phone, any personal details that may have been voluntarily provided by the customer, whether to Unique Identification Authority of India (UIDAI), Credit Information Bureau of India Limited (CIBIL) or any other agency including but not limited to any other Credit Information Companies (CIC). Personal data shall also include all Personally Identifiable Information (PII) and Sensitive Personal Information (SPI). Other personal data would include Loan Application Number.

i. Information Collected when you use our website: We collect data about you or your usage for the purpose of providing loan / other financial services to all of our users and such information is kept

protected at all times. We may collect data in the following ways. Many of our services require you to register/sign up for an account on GHFL. When you do, we will ask for Personal Data, such as, but not limited to your name, email address, contact number, country, address to create/ update your account

When you use the GHFL websites, GHFL mobile applications, or request for more information or request assistance or when you apply for loans, GHFL would request for and collect Personal Data (Personally Identifiable Information (PII) or Sensitive Personal Information (SPI) ), including but not limited to Name, Email ID, Contact number, address, financial information, bank statements, bank account details, credit information, family information, employment information, property details, ongoing loan details, business information, PAN card, Aadhar card, Passport, Driving license, other forms of identification proofs and such other required information and their supporting documents . Personal data may be collected by authorized representatives or mediums. We may collect personal/any and all forms of data for business purposes, sanctioning loan, processing loan cases, further providing assistance or services, service offerings, maintaining an audit trail as per regulatory and statutory requirements. This personal data may be collected, stored, processed, transferred between GHFL and its third party service providers for business purposes. Data security shall be maintained throughout the life cycle of the data/processes.

In the event that any data is shared by customers over unofficial channel such as:

- Social media platforms,
- Whatsapp application,
- Telegram application,
- Media sharing applications other than provided by GHFL
- Email IDs domains other than GHFL domain (such as @gmail / @yahoo / @Rediff / other non-GHFL domain)

GHFL will not be responsible for the data privacy and security. Users are advised to share data only with authorized representatives via official channels.

In case any representative suggests any unauthorised alternate medium for data collection, GHFL shall not be responsible for the data privacy and security of such data/information.

When you use the GHFL Website or GHFL Mobile Applications to provide feedback, we collect your Personal Data including but not limited to name, title, Email ID, contact number, address and country. We collect data about the services that you use and how you use them. This data includes, but not limited to, log data and location data . We may collect your data through marketing campaigns and publicly available sources.

When you communicate with GHFL or use the GHFL platform to communicate with other members, we collect data about your communication and any data you choose to provide. If you choose to sign in with your social media account to access GHFL, or otherwise connect your social media account with the services of GHFL, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the data that you make available to us through the social media interface.

ii. Information Collected when you use our applications: When you download our mobile application or use our hybrid application (related to our various services) we collect the below information, but not limited to –

- Email ID
- Name
- Address

- Country/City
- Mobile Number

GHFL does not collect Personal Data about individuals except when such individuals specifically provide such data on a voluntary basis. Upon such voluntary disclosure of Personal Data, we may further verify, collate or receive data about you from publicly and commercially available sources (in accordance with applicable law), which we may combine with other data we receive from you. We may also receive data about you from third-party social networking services, wherein you have provided such consent to those third-party platforms, if you are already connected with those services.

GHFL has adopted the 'Fair Practice Code' and has grievance redressal mechanism which can be accessed at <https://www.godrejcapital.com/GHF/about-us.html>

### **Lawful Basis of Processing**

The information is collected for a lawful purpose connected with a function or activity of GHFL or any person on its behalf; and the collection of the sensitive personal data or information is considered necessary for that purpose. We may process your data because:

- You would have given us permission to do so
- We have provided services to you or because you have availed/shown interest for one of our offers/products
- To comply with the law
- We have a contract with you

### **Use of Personal Data**

We use Personal Data to provide you with any service you explicitly requested for, to resolve disputes, troubleshoot concerns, help promote safe services, assess your interest in our services, inform you about offers, products, services, updates, customize your experience, detect and protect us against errors, fraud and other criminal activity, enforce our terms and conditions, etc.

We may also use your Personal Data to send you offers regarding various services/facilities which GHFL or its group companies may, from time to time, launch. Your consent will be taken before we send you any such communication.

### **Cookies and Other Tracking Technologies**

Some of our Web pages utilize "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect data about website activity. Some cookies and other technologies may serve to recall Personal Data previously indicated by a Web user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original user ID and password to gain access to certain parts of the Web site.

Tracking technologies may record data such as Internet domain and host names; Internet protocol (IP) addresses; browser software, co-browsing services, and operating system types; clickstream patterns; and dates and times that our site/application is accessed. Our use of cookies and other tracking technologies allows us to improve our website/applications and your Web experience. We may also analyse information that does not contain Personal Data for trends and statistics.

### **Information Sharing and Disclosure**

We provide access of your Personal Data to few employees who we believe reasonably need to know that data in order to fulfil their jobs to provide, operate, develop, or improve our products or services.

GHFL does not rent, sell, or share Personal Data about you with other people or non-affiliated companies except:

- to provide products or services you've requested
- when we have your permission
- as required by law or legal process
- or for services and offerings

### **Sharing of Data with Third Parties**

We provide the data to trusted partners who work on behalf of or with GHFL under confidentiality agreements. These companies may use your Personal Data to help GHFL communicate with you about offers from GHFL and our marketing partners. However, these companies do not have any independent right to share this data

We may disclose your personal data to agents or contractors of GHFL and/or its group companies/affiliates to enable processing of transactions or communications with you "on need" basis. Your aforesaid data may be further used for assessment and analysis of our market, customers, products, and services and to understand the way people use our Services so that we can improve them and develop new products and services. However, it shall be on the basis that the agents are required to keep the data confidential and will not use the data for any other purpose other than to carry out the services they are performing for GHFL and/or its group companies/affiliates

With your permission we may share your personal data with Godrej group and/or its affiliates or providing details on latest offers from our other entities.

### **Third-Party Links and Content on Services**

Our Services may link to third-party websites/applications and services that are outside our control. Further, GHFL, its group companies, its affiliates, and their directors and employees ("Godrej Group") accept no liability and will not be liable for any loss or damage arising directly or indirectly (including special, incidental or consequential, punitive, or exemplary loss, damage or expenses) from your use of any application or any website, howsoever arising, and including any loss, damage or expense arising from, but not limited to, any defect, error, omission, interruption, imperfection, fault, mistake or inaccuracy with any online application, its contents (material, data, money market movements, news items, etc.) or associated services, or due to unavailability of any application or any part thereof or any contents or associated services even if GHFL is advised of the possibility of such damages, losses or expenses.

### **Minors**

To use the website/Application you agree that you must be the minimum age (described in this paragraph below) or older.

The minimum age for these purposes shall be 18, however if local laws require that you must be older in order for GHFL to lawfully provide the services mentioned on the Website/Application to you then that older age shall apply as the applicable minimum age.

### **Data Retention**

Your personal data processed by GHFL, or its third-party service providers shall be kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data was collected/stored/processed in line with legal, regulatory, contractual or statutory obligations as applicable.

Your personal data and all data collected during the information gathering, sanctioning of loan, processing of loan, and any other process of providing services, shall be retained for tenure of the loan. Post loan closure the personal data shall be retained for statutory retention period as per the regulatory requirements and applicable law. The regulatory requirement and applicable law for personal data retention may change from time to time and the retention period would be amended from time-to-time to comply with the rules and regulations.

### **Data Purging Protocol**

At the expiry of retention period, your personal data may be purged or archived to comply with legal/contractual retention obligations or in accordance with applicable statutory retention periods, as applicable at that point in time. Certain minimal personal data may be retained after the data purging/archival process to comply with internal policy or statutory or legal or regulatory requirements at that point in time. Customers would have the option to grant/revoke consent based on which data retention or data purging guidelines would be followed as per the regulatory or statutory requirements.

### **Security and Confidentiality**

GHFL would implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of personal data. At GHFL, we are strongly committed to protecting the personal and financial data that is submitted to us.

GHFL shall ensure to safeguard the security and confidentiality of any data shared with us. Any personal data obtained by us shall not be used or shared other than for the purposes to which you provide your consent. However, despite our utmost efforts to protect your Personal Data, GHFL cannot warrant the security of any data you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your Personal Data is done at your own risk.

Lastly, you are requested to help us protect your data privacy by maintaining the secrecy of the username and password you use for any of our Services.

Any breach of data or personal information shall be handled as per the regulatory or statutory requirements as may be applicable. Personal data shall be stored in systems within India as per regulatory and statutory requirements.

### **Social media**

GHFL operates channels, pages and accounts on some social media websites/platforms/ public websites to inform, assist and engage with customers. GHFL monitors and records comments and posts made on these websites/platforms/public websites about GHFL in order to improve its products and services.

Please note that you must not communicate to GHFL through such social media sites the following information:

☒ Sensitive personal data

☒ Excessive, inappropriate, offensive or insulting information towards individuals.

GHFL is not responsible for any information posted on public websites/ social media websites other than the information posted by its authorized representatives/employees on GHFL's behalf. GHFL is only responsible for its own use of the personal data received through such websites.

### **Disclaimer**

GHFL shall not be liable for any loss or damage sustained by reason of disclosure (inadvertent or otherwise) of any data concerning the user's account and / or data relating to or regarding online transactions using credit cards / debit cards and / or their verification process and particulars nor for any error, omission or inaccuracy with respect to any data so disclosed and used whether or not in pursuance of a legal process or otherwise. GHFL does not store any Credit / Debit card details. Any other personal and sensitive Personal Data shared by you which is not asked by GHFL during registration, either mandatorily or optionally; accounts to wilful and intentional furnishing of data/information ; and GHFL will not be liable for breach of such data.

### **No contractual obligation**

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.

### **Intellectual Property Rights**

Please note that GHFL retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all information provided on or via this web site/applications (including all texts, graphics and logos).

### **Changes to this Privacy Policy**

GHFL reserves the right to change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested to review the Privacy Policy periodically, to make sure that you are aware of any such changes. This Privacy Policy shall apply uniformly to GHFL website and GHFL applications or any other media used by GHFL for its Services. Any changes or updates will be effective immediately upon posting the same on our web site at <https://www.godrejcapital.com/GHF/about-us.html>. If you have any questions or concerns or require any clarifications with respect to this Privacy Policy, please do so by calling us on 8657764527 or email at the following address: [nodalofficer@godrejhf.com](mailto:nodalofficer@godrejhf.com).

### **Annexure A: Third Party Service Providers**

This annexure consists of a list of Third-Party service providers/vendors/partners/contractors who have been authorized by Godrej Housing Finance Limited to support in business operations.

#	Third Party Name
1	CRM ( Internal appl only accessed via VPN)
2	ESSCom module
3	CIBIL
4	Perfios
5	Karza
6	Hunter
7	Video KYC / PD
8	WhatsApp Customer Bot
9	Bot Platform (Same as WhatsApp BOT)
10	DMS
11	Comm 360 & Admin Portal - Linked to Whatsapp Channel
12	Pennant Verification Portal
13	Pennant Collections System
14	Pennant Agency Portal
15	Incentive Calculation/Management
16	CERSAI RPA module
17	LeadSquared
18	Marketing Automation - Leadsquared
19	Bulk Email / SMS / Kaleyra