

DATA CONFIDENTIALITY AND PRIVACY POLICY

VERSION CONTROL:

Version	Date of Adoption	Change Reference	Owner	Custodian	Approving Authority
1.0	18-Feb-2016	Adoption of the Data Confidentiality and Privacy Policy as per Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and Credit Information Companies (Regulation) Act, 2005	IT Team	Compliance Team	Board of Directors
1.1	22-Jun-2021	<p>Updated the Data Confidentiality and Privacy Policy with the following:</p> <ul style="list-style-type: none"> - updation of Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 reference and - From joint authority of CEO and COO, authority to CEO is modified w.r.t. for waiving off the requirement for sharing customer's personal data based on compelling business/ compliance logic but within the principles laid down under this policy. 	IT Team	Compliance Team	Board of Directors

DATA CONFIDENTIALITY AND PRIVACY POLICY

Ashv Finance Limited (erstwhile Jain Sons Finlease Limited) (hereinafter referred to as “**Ashv Finance**”) is governed by the Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and Credit Information Companies (Regulation) Act, 2005. These acts regulate Ashv Finance’s handling of 'personal information', which means information or an opinion that identifies an individual/company or allows their identity and other details to be readily worked out on the basis of such information.

This policy (together with the Terms and Conditions and any other documents referred to in it) sets out the basis on which any personal data collected from companies or their agents, or that provided by companies or their agents, which will be processed, stored and / or shared with other parties by Ashv Finance. Such information may be provided by Customers (including actual customers and potential customers or any of their employees, directors, agents or appointed nominees) to Ashv Finance by any means, with the intentions of establishing a relationship, of whatsoever nature, with Ashv Finance. Under this Privacy Policy, Ashv Finance shall receive, store, process data received (Company Information) from its Customers to whom it may consider to give loan. This Policy shall also deal the manner in which Ashv Finance shall share the Company Information with other parties. In addition to the information that the Ashv Finance elicits from its Customers, the Customers are free to volunteer any other information that they feel that the Ashv Finance needs to know, but the security and confidentiality under this Policy is limited only to information that the Ashv Finance directly asks from Companies.

Ashv Finance may use the Company Information for, among other things, customer verification, provision of products and services, for personalization of products or services, marketing or promotion of its financial services or related products or that of our associates and affiliates; analysis or credit scoring, enforcement of companies obligations, any other purpose that will help Ashv Finance in providing companies with optimal and high quality services.

Ashv Finance will give access to Company Information to only authorised employees. Employees who violate this Privacy Policy shall be subject to disciplinary process as per the internal guidelines of Ashv Finance. Any employee who withdraws from the employment of Ashv Finance will have to undertake to abide by this Privacy Policy and keep all Company Information secure and confidential.

Ashv Finance may disclose the Company Information to any person, without any limitation and the Customers hereby give their irrevocable consent for the same, provided such disclosure is to:

- To comply with legal requirements, legal process, legal or regulatory directive/ instruction; or
- To enforce the terms and conditions of the products or services or any other existing agreements; or
- To protect or defend rights, interests and property of Ashv Finance or that of its associates and affiliates, or that of our or our affiliate's employees, consultants etc.; or
- For fraud prevention purposes; or
- As permitted or required by law;

Ashv Finance may disclose the Company Information to third parties for following, among other purposes, and will make reasonable efforts to bind them to obligation to keep the same secure and confidential and an obligation to use the information for the purpose for which the same is disclosed, and companies hereby give your irrevocable consent for the same:

- For participation in any telecommunication or electronic clearing network; or
- For the purpose of audit – whether statutory or otherwise or in relation to capital raising activities by Ashv Finance; or
- For credit rating of Ashv Finance by any credit rating agency; or
- For advertising; or
- For facilitating joint product promotion campaigns; or
- For the purposes of credit reporting, verification and risk management to/ with clearing house centres or credit information bureau and the like; or
- For availing of the support services from third parties e.g. collecting subscription fees, and notifying or contacting you regarding any problem with, or the expiration of, any services availed by companies

Except for the above-mentioned purposes, Ashv Finance may share Company Information with any other purpose at the specific request received by the Customer or with prior approval from the Customer for any such disclosure.

Unless absolutely necessary, the company shall not disclose names of the customers and their principals, agents and representatives to anybody outside the employees of Ashv Finance. For submission of above data, unless absolutely necessary, the data shall be shared on no-name basis and could include the aliases, client/ loan codes etc. For ample clarity, the non-employees shall include non-employee affiliates of Ashv Finance, its non-employee Shareholders, Board members etc. Specifically to the lenders, all details pertaining to the loan book hypothecated to respective lenders will be shared with them and rest will be shared with aliases/ codes. CEO of Ashv Finance can waive off the above requirement based on compelling business/ compliance logic but within the principles laid down under this policy.

Ashv Finance reserves the right to modify this Privacy Policy from time to time in order that it accurately reflects the regulatory environment and its data collection principles. Upon each change to the Policy, Ashv Finance shall allow access to such changes / revised Policies to all concerned stakeholders by way of display of this Privacy Policy on its official website.

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