

Privacy Policy

Information:

Document	Classification	Version	Status
Privacy Policy	Confidential	1.0	Adopted vide resolution of the Board of Directors

Version History, Verification and Approval:

Date	Version	Description of Change	Owner	Approved By
18-11-2024	1.0	1st Policy prepared	Jimit Gosalia	Prashant Bhonsle

PRIVACY POLICY

This Privacy Policy ("Privacy Policy"/"Policy") is published in accordance with Rule 4(1) of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011. KUHOO FINANCE PRIVATE LIMITED (hereinafter referred to as "Kuhoo" or "Company" or "Us" or "We" or "Our"), a Non-Banking Financial Company (NBFC), is the owner of the mobile application "Kuhoo" ("App"), website at www.kuhoo.com ("Website"), and online forms (collectively referred to as the "Platform").

By accessing the Platform and/or availing the Services offered by us, the User ("User" or "You" or "Your") agrees to be bound by the terms of this Privacy Policy.

If You do not accept this Privacy Policy or any part thereof, please do not use/access/download or install the Platform. The User acknowledges, agrees, and consents to the collection, use, processing, disclosure, transfer, and storage of their information (including personal data) in accordance with this Privacy Policy and as required for Kuhoo's NBFC operations.

USER'S INFORMATION

User's personal information

When the User visits Our Platform or avails the Services, We collect and store the information which the User provides from time to time by explicitly seeking permissions from the User in order to provide efficient, smooth, customised experience and service. This allows Us to provide Services with features that meet the requirements of the User. We collect below mentioned individually identifiable information that would allow Us to determine the actual identity of the User:

- Name
- Address
- Mailing address
- Telephone number
- E-mail
- Image
- Credit/Debit card number, cardholder's name, card expiration date
- Information about User's mobile phone
- Permanent Account Number (PAN)
- Academic records and certificates
- Employment information and data
- Information from credit bureaus
- Family member details

- College/University details
- Documents such as PAN, Photo, Address Proof, Academic certificates, Bank Statement, Employment proofs, Entrance test certificates or any other documents required from the User in connection with availing the Services.
- Any details that may have been voluntarily provided by the User in connection with availing the Services.

By providing the above-mentioned information to Us, the User consents to the collection, use and disclosure of personal and sensitive personal data, as permitted by the applicable law.

KYC details

As a part of Our Video Know Your Customer (Video KYC) process, the collection of User's personal information has become mandatory to ensure the completion and authentication of User's KYC. In this regard, permissions to access the User's microphone and camera shall be required. The User hereby gives explicit consent to share his/her personal information with Us and with the third parties who help us in providing Services seamlessly.

Other information

We automatically track certain information about the User based on their browsing history 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 and not individually. We also collect User's Internet Protocol (IP) address and the URL used by the User to connect the User's computer to the internet, etc. This information may include the URL which the User visited before visiting the Platform (whether this URL is on Our Platform or not), which URL the User visits after visiting the Platform (whether this URL is on our website or not), User's computer browser information, and User's IP address.

Cookies

We use cookies on Our Platform for enhancing the Services provided; cookies are small data files that a website stores on the User's computer. The use of this information helps Us identify the returning User in order to make Our Platform more user friendly. Most browsers will permit the User to decline the cookies, but if the User chooses to do this, it might affect the service on some parts of Our Platform.

PURPOSE AND USE OF INFORMATION COLLECTED

We collect the personal information of the User to efficiently provide the Services, to observe and improve the quality of Services, to analyse how the Platform is used and diagnose technical problems, to verify the User's identity and credentials in order to determine the eligibility, to facilitate the User's KYC, to use the Platform and avail the Services, to enable

Us to comply with Our legal and regulatory obligations, to enforce Our Terms of Use, and to inform the User about Our offers, products, services, and updates.

By contacting Us and by providing Your phone number, contact details or any other details, You give us the unequivocal right to:

- We may contact you through various communication channels—including but not limited to phone calls, emails, SMS, WhatsApp, mobile applications, in-app messages, push notifications, chatbots, or any other lawful and appropriate means—for purposes such as responding to your queries, requests, or grievances; providing customer support and service-related updates; delivering transactional, informational, or promotional content; conducting feedback or satisfaction surveys; or for any other legitimate and lawful purposes.
- Contact You through phone or message notwithstanding the fact that You may have registered under the Telecom Regulatory Authority of India regulations as a fully blocked or a partially blocked customer. It is further clarified that We shall only make solicited phone calls or messages;
- Share the contact details provided by You with the service provider or agent or representative available on or through the Platform who may be in a position to sufficiently answer or respond to Your query, including but not limited to third party service providers.

We understand that Your contact details are important to You and We shall bind the service providers/agents/affiliates having access to Your information with the same level of protection as required under the applicable laws.

SHARING OF INFORMATION

We may share Your information with third parties, to provide better Services to You. However, We are not responsible for any breach of security or for any actions of any third parties that receive Your personal information. Please note that by agreeing with the terms as laid out in this Privacy Policy, You also provide Your consent to:

- Share Your information with Our third-party partners in order to conduct data analysis to serve You better and provide Services on/through Our Platform.
- Disclose information provided by You with other technology partners to track how You interact with the Platform.
- Disclose Your information to Our third-party technology and credit partners to perform credit checks and credit analysis, such as Credit Bureaus or third-party data source providers.
- Share Your information with another business entity should We (or our assets) – merge with, or be acquired, or be amalgamated with, or We undergo the restructuring of business for any reason. Should such a transaction occur then any such business entity (or the new combined entity) receiving any information from Us shall be bound by this Policy with respect to Your information.
- Share with You promotional offers, which may be on behalf of other businesses.

- 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.
- Share/disclose Your personal information to the concerned third parties in connection with the Services; and with governmental authorities, quasi-governmental authorities, judicial authorities, and quasi-judicial authorities in accordance with applicable laws of India.
- To contact You with various offers, and follow-ups.

STORAGE AND DELETION OF DATA

We store and process Your personal information on third party cloud servers and other cloud service providers. We use reasonable safeguards to preserve the integrity and ensure the security of Your information provided to Us against loss, theft, unauthorised access, disclosure, reproduction, use or amendment. We use reasonable security practices and procedures as mandated under the applicable laws for the protection of Your information. Information You provide to Us may be stored on Our secure servers located within or outside India.

However, You understand and accept that there is no guarantee that data transmission over the internet will be completely secure and that any information that You transmit to Us is at Your own risk. We assume no liability for any disclosure of information due to errors in transmission, unauthorised third-party access to our Website and databases or other acts of third parties, or acts or omissions beyond our reasonable control. You shall not be entitled to hold Kuhoo responsible for any such breach of security.

You may request the deletion of any data from our Platform at any time by submitting a formal written request to our Grievance Officer. Such requests must clearly specify the information to be deleted and provide the reasons for the deletion request.

Notwithstanding anything to the contrary stated herein, please note the following specific scenarios where your deletion request may not be accepted:

1. Ongoing Services: In the event that you are currently availing any ongoing services from us.
2. Legal and Regulatory Requirements: If the information is required to be maintained in accordance with applicable laws and regulations, we may be obligated to retain certain data despite your deletion request.

Subject to the provisions of this section, we will make reasonable efforts to delete your data upon receiving your written request. However, it is important to understand that following the deletion of your data, you may no longer be able to use our services, as the necessary information required to provide these services will no longer be available.

We shall not be liable for any consequences arising from the deletion of your data, including but not limited to the inability to access or use our services. Your deletion request will be processed in accordance with our internal policies and applicable laws.

LINKS TO OTHER SITES

Our Platform links the User to other websites that may collect information about the User. We are not responsible for the privacy practices or the content of those linked websites. With this Privacy Policy, we are only addressing the disclosure and use of personal data collected by Us. If the User visits any such third-party websites/links, their data collection practices, and their policies might be different from this Privacy Policy. Please check these policies and the terms of the platforms or services before You submit any information to these platforms/services or otherwise use these platforms/services. We do not have control over any of their privacy policies and we shall not have any liability in this regard.

USER CONSENT

By using the Platform, availing the Services and/or by providing the personal information, the User consents to the collection, sharing, disclosure and usage of the information in accordance with this Privacy Policy.

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.

CONTACT US

In case of any complaints pertaining to the terms and conditions of this Privacy Policy, You may contact the designated Grievance Redressal Officer who shall address the same within a reasonable period of time. In accordance with the Information Technology Act, 2000 and the Rules made thereunder, the name and contact details of the Grievance Officer are provided below:

Name - Ms. Bhakti Nayak

Email – feedback@kuhoo.com

EXCEPTION HANDLING

The policy shall always be updated with extant regulatory provisions. However, in case of conflict between the Policy and regulations, the regulatory provisions shall always supersede the policy.

The updated policy shall be always adhered to and exceptions if any to the policy shall be approved by the board of directors after recording a reason in writing.

APPROVAL AND POLICY REVIEW

- This policy has been adopted vide resolution of the Board of Directors of the Company dated _____.
- This policy shall be applicable across the Company organization wide with effect from _____.
- The policy will be reviewed annually or earlier, if required, based on regulatory changes or business needs.