



Fifty Fintech Private Limited
50Fin_DLA Data Collection & Purging Policy_V.1

This is the DLA Data Collection and Purging Policy (“Policy”) of FIFTY FINTECH PRIVATE LIMITED (“50Fin”), a company incorporated under the Companies Act 2013 and having its registered office at 2/6 MSR Garuda, MSRIT, Mathikere Road, Bangalore - 560054, India (“Company”). The Policy has been drafted in accordance to Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and published according to the Rule 4 of Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and The Digital Personal Data Protection Act, 2023 wherein the Body corporate is required to provide policy for privacy and disclosure of information.

In addition to the above regulations, 50Fin’s DLA falls under the purview of the RBI’s Digital Digital Lending Guidelines (DLG) dated May 08, 2025, which lay down the framework for Loan Service Providers (LSPs) and the DLA they operate. Adaptation of this policy ensures transparency in the collection, transfer, and retention of customer data, and emphasizes on responsible usage of the data collected as per the RBI’s directions.

1. Scope

This Policy sets forth policies & practices in connection with personal information collected through 50Fin website, and any mobile or web-based sites, applications, sales executives, physical or digital forms or other mobile interactive features. This Policy outlines practices in relation to the storage, segregation, use, processing, transfer, purging and disclosure of Personal Data that Users/Customers have chosen to share on 50Fin applications.

2. Role and Responsibilities

Function	Activities
Tech Lead	- Responsible for ensuring that this document is observed in respect of data obtained from users, service providers and project development data for which they have responsibility and is stored under the authority of 50Fin. - Ensure the Policy is inline with RBI’s directions and RE’s Policies.

3. Definitions

“**Customer**” shall mean the Users who have applied for credit facility with a particular RE

“**DLA**” Digital Lending Application owned and operated by 50Fin

“**DLG**” Digital Lending Guideline by RBI

“**LSP**” shall mean 50Fin who is a Loan Service Provider to RE

“**PII**” or Personally Identifiable Information, is any data that can be used to identify a specific individual, either directly or indirectly and as defined under 4.1

“**RE or REs**” is the Regulated Entity listed on the DLA as lenders

“**RTA**” Register and Transfer Agents for securities

“**Third Party**” or “**Third Parties**” shall mean the entities associated with the RE and/or 50Fin, including but not limited to RTAs, KYC/VKYC service providers, auditors, regulatory authorities, and any other service providers as may be authorised by the RE and/or 50Fin.

“**User**” who has signed-in to the 50Fin application. The Users may or may not have applied for credit products offered by RE

4. Types of Data Collected on the DLA and its purpose

4.1. Personally Identifiable Information:

- 4.1.1. "Customer Name"
- 4.1.2. "Phone Number"
- 4.1.3. "PAN Number"
- 4.1.4. "E-mail id"
- 4.1.5. "Date Of Birth"

These PII data are essential and basic DLA User details. Collected at the time of sign-up on the application.

4.2. Loan Qualification Data

- 4.2.1. "User's Scrip Data"

Scrip level data of the User is pulled from this/her RTA on obtaining explicit consent. This data is essential to show the User's credit eligibility.

4.3. Customer Additional Information(*specifically collected on behalf of the RE*)

- 4.3.1. "occupation":
- 4.3.2. "nature_of_business":
- 4.3.3. "annual_income":
- 4.3.4. "purpose_of_loan":
- 4.3.5. "marital_status":
- 4.3.6. "father_or_spouse":
- 4.3.7. "father_name":
- 4.3.8. "mother_name":
- 4.3.9. "residence_type":

- 4.3.10. "is_financially_dependent":
- 4.3.11. "is_pep": "No" etc.

These RE specific data is collected from the Customer to provide additional information to support underwriting decisions by the RE.

4.4. **E-mandate Set-up** (*specifically collected on behalf of the RE*)

- 4.4.1. "account_type":
- 4.4.2. "bank_name":
- 4.4.3. "account_number":
- 4.4.4. "account_name":
- 4.4.5. "ifsc_code":

Bank account details are collected on the DLA to set up auto debit for interest payment collection and credit recovery.

5. **Data Collection Principles**

- 5.1. Data should be collected with prior and explicit consent of the User at every stage with audit trail, before sharing with RE or any Third-Party, except for cases where such sharing is required as per statutory or regulatory requirements.
- 5.2. Only minimum data shall be stored by 50Fin that is required to carry out its day to day operations and services within the scope of an LSP to an RE.
- 5.3. All the data collected shall only be stored in servers located within India. In case the data is processed outside India, the same shall be brought back to India within 24 hours of processing.
- 5.4. No biometric data shall be collected.
- 5.5. LSP desists from accessing mobile phone resources like file and media, contact list, call logs, telephony functions, etc. A one-time access can be taken for camera, microphone, location or any other facility necessary for the purpose of on-boarding/ KYC requirements only, with the explicit consent of the borrower.
- 5.6. Information Security controls shall be implemented for Customer data collected on behalf of RE.
- 5.7. Once an User initiates a loan application, all the data collected hereafter shall be specific to RE and the type of data collected and its retention shall be agreed between the LSP and RE.

6. **Data Retention and Purging Rules**

6.1. **User-Specific Data Retention**

The User specific data as mentioned in point 4.2 & 4.2, meaning the data not collected for or on behalf of RE shall be retained for a period of 7 years to meet 50Fin's business or regulatory requirements.

6.2. RE-Specific Data Retention and Purging

The RE-specific data, as mentioned in Sections 4.3 and 4.4, which is collected for or on behalf of the RE on the DLA, shall be retained and purged based on the applicable loan status as follows:

1. Customer who has availed the credit facility:
RE-specific data shall be retained until the later of:
 - 90 days from the loan closure date; or
 - the end of the loan tenure.
2. Customer referred to the RE but who has not availed any credit facility:
Where:
 - the loan journey is not completed by the Customer; or
 - the loan is approved but not availed by the Customer, the RE-specific data shall be retained for 7 days and purged thereafter.

6.3 User-Initiated Account/Data Deletion

Once the User is no longer under the service or is not an active loan Customer, the User may request deletion of their data by selecting Profile > Account > Delete Your Account Permanently on the DLA.

Upon receipt of a valid deletion request, the applicable data shall be permanently deleted within a reasonable period and, in any case, latest within 7 days of receiving the deletion request, subject to the retention exceptions specified under Section 6.4.

6.4 Retention Exceptions

Notwithstanding the deletion provisions under Section 6.3, 50Fin may retain certain data after account deletion where retention is necessary for any of the following purposes:

1. There is an unresolved escalation, claim, or dispute;
2. Retention is required under applicable law or regulatory requirements;
3. Data is required to be retained in aggregated and/or anonymized form; or
4. Retention is necessary for legitimate business interests, including fraud prevention and enhancing User safety and security.

7. Applicability

This policy is applicable to all employees and partners of 50Fin in its capacity as a LSP to any RE. It shall be followed by all individuals and entities engaged in the development, operation, management, or support of 50Fin's DLA and related services.

8. Version Control

Version	Release Date	Release Type
V.1	01/12/2025	Initial Release