



# Sugmya Finance Private Limited

## PRIVACY POLICY

### Revision By

Version	Author/Issuing Department	Revision Date
V1.0	Internal Process & Policy	28-Aug-2022

### Reviewed By

Reviewer Name	Date Reviewed
Mr. Anil Pandey	30-Aug-2022
Mr. Tarwar Singh Shilpi	30-Aug-2022
Ms. Shikha Gangwar	30-Aug-2022

### Approved By

Approved By	Date Approved
Mr. Brajmohan Singh	01-Sep -2022

## PRIVACY POLICY

This policy is applicable to all the existing customers, prospect customers and persons (“User”) who visit the office/branch and/or any ‘Digital Property’ belonging to Sugmya Finance Private Limited and the term Digital Property would mean and include website, mobile application and/or any other electronic application.

Sugmya is committed to treating data privacy seriously. It is important that you know exactly what we do with the personal data you and others provide to us, why we process it and what it means to you. Please read this Privacy Policy carefully to understand our views and practices regarding your personal data and how we will treat it. If you do not agree to the terms of this Privacy Policy, please do not further use or access Sugmya website/applications.

### **Purpose:**

Information collected from user may be used by Sugmya for the following listed “Purposes”:

- to provide the User with the services incidental and/or ancillary to the business of Sugmya.
- to promote the products/services of Sugmya.
- for evaluation of the existing Sugmya products/services, and/or develop products/services;
- to render service to User and/or to enhance / improve the Products/Services.
- to comply with Applicable Laws / regulations, including credit reporting;
- to the extent permitted by Applicable Law / regulations, share or process User’s information in connection with the products / services provided by Sugmya and/or any third party.

### **Who we are**

Throughout this document, “we”, “us”, “our” and “ours” refer to Sugmya.

### **Sugmya means:**

Sugmya Finance Private Limited having its registered office at Sugmya Finance Private Limited., 602, 6<sup>th</sup> Floor, Plot No. 16, Rishabh Corporate Tower, Community Center, Karkardooma, Delhi-110092, India.

**Website:** [www.sufinn.com](http://www.sufinn.com)

Our contact details are given at the end of this Privacy Policy and for further details about Sugmya, please visit the about us page in our website.

### **Collection of Information:**

- Sugmya, its officials and employees are required to collect certain information (which may include sensitive personal information) from you to assist us in our relationship with you.
- You understand that during the course of using this website you may be providing Sugmya and its affiliates, vendors or partner NBFCs, such information about myself that may constitute as “sensitive personal information” as defined by the Information technology Act, 2000 and the Information Technology Act (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information), Rules, 2011, and you hereby provide your consent for use of such sensitive personal information in such manner as has been provided in the Privacy Policy, by the Company, its affiliates, vendors or partner NBFC’s.
- If you are unable to provide the information, we may not be able to provide you with the product or service, you have requested. The types of information collected can include:

## Types of information

### 1. **Personal Information:** While advancing loan to the customer we may gather the following information:

- Loan Amount Requested
- Name
- Mobile Number
- Email Address
- Date of birth
- Residential Address along with Pin Code
- Residence Ownership Status
- Partner / Director Details
- Office Address
- Office Pin code
- Office Ownership Status
- Company Name
- Constitution Type
- Business Type
- Entity Type
- Industry
- No. of years in business
- Business Turnover
- Business Profit After Tax
- Existing EMI Obligation
- ITR filed or not for the current year
- ITR filed or not for the last year
- Social Data from Facebook, LinkedIn, Google
- Banking Data collected/Bank passbook
- Balance Sheet for last 2 years (if applicable)
- Profit & Loss statements for last 2 years (if applicable)
- Income Tax Returns for the last 2 years
- ID proofs (Passport, PAN, Election / Voter ID card, Driving License, Aadhaar Card, Government ID Card)
- Address Proofs (Passport, PAN, Election / Voter ID card, Driving License, Aadhaar Card, Government ID Card, Lease Agreement, Property Tax Receipts, Electricity Bills).
- IP address, a unique identifier for your computer, cellular phones, tablets or such other device (“Devices”)
- Information which relates to your financial affairs, business, employment, income or assets.
- Address of place where your documents may be collected.
- Information collected and/or disclosed at the time of personal discussions (PD) with our credit team/underwriters or documents collection employees.
- Information which would help Sugmya determine your eligibility to avail the products and services offered.
- Information which helps Sugmya process applications made by you for particular products and services such as bank statement, Bank passbook, income tax returns, loan co-applicant’s personal information (if applicable).
- Any personal information you may provide to us during any telephonic conversation or email communication with our employees or during document collection by our employees.
- Any other information that Sugmya is required to collect.

## 2. Non-personal information

- At this Website, information sent by your web browser, may be automatically collected. This information typically includes the domain name (the site after the @ in your e-mail address). It may also contain your user's name (the name before the @ in your e-mail address). Other examples of information collected by our server include the Internet Protocol (IP) address used to connect the visitor's computer to the Internet, operating system and platform, the average time spent on our website, pages viewed, information searched for, access times, Websites or applications visited before and after a visitor visits our website, and other relevant statistics. The amount of information sent depends on the settings you have on your web browser. Please refer to your browser if you want to learn what information it sends;
- All such information will be used to assist us in providing an effective service on this Website. We may from time to time supply the owners or operators of third-party websites from which it is possible to link to our website with information relating to the number of users linking to our website from such third-party websites;
- We also use the information which we automatically receive from your web browser to see which pages you visit within our website, which websites you visited before coming to ours, and where you go after you leave. This is helpful to understand how our visitors use this website. We use this information in the aggregate to measure the use of our website and to administer and improve our website. This statistical data is interpreted by the Company in its continuing effort to present the Website content that visitors are seeking in a format they find most helpful;

### Cookies

Cookies are small data files that a website stores on your computer/electronic device. While cookies have unique identification nos., personal information (name, a/c no, contact nos. etc.) will not be stored on the cookies. Sugmya may:

- use persistent cookies which are permanently placed on User's computer to store non-personal (Browser, ISP, OS, Clickstream information etc.) and profiling information (age, gender, income etc.).
- use Information stored in the cookies to improve User experience by throwing up relevant content where possible;
- use the cookies to store User preferences to ease User's navigation on the website/electronic/mobile application.

### Data Governance and trainings

Securing User's Information is of paramount importance to Sugmya. Following some are of the initiatives by Sugmya to security privacy of the User's Information:

- Sugmya has reasonable management, technical and administrative measures in place to protect Information within Sugmya.
- Sound technical controls around Information and underlying systems are in place.
- Sugmya adheres to multiple regulatory and statutory requirements like RBI's Master Direction

for NBFC, Guidelines for NPCI guidelines for Data localization, etc.

- Sugmya conducts periodic internal and external audits of its systems.
- Updates on information security position is updated at regular intervals to Board members, senior management of Sugmya via IT strategy committee as well as Risk Management Committee.
- In all contractual arrangements, we require Sugmya employees, third party agencies/service providers to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information. Staff also undergo mandatory information security awareness training annually once and at the time of joining.
- Any acts involving (i) unauthorized usage/ sharing of Information, (ii) breach of security procedures; (iii) usage of Information for unlawful gain (iv) breach of IT policy/procedure; and (v) breach of confidentiality as per employment terms and/or Code of Conduct, shall warrant appropriate disciplinary action as per Company's Policy.

### **Commitment to Information Security**

- We take appropriate measures to ensure that your information disclosed to us is kept secure, accurate, and up to date. This site has reasonable security measures in place to protect the loss, misuse, and alteration of the information under our control.
- Unauthorised attempts to upload or change information (or otherwise cause damage to this Website) are strictly prohibited. However, we assume no liability for any disclosure of information due to any 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. In the event Sugmya becomes aware of any security breach, we will notify you as soon as possible and take appropriate action to the best of our ability to remedy such a breach.

### **Responsibility of User**

- Sugmya will not be liable / responsible for any breach of privacy owing to User's negligence.
- Sugmya and/or its employees /assigns will not contact the User directly for disclosure of any sensitive and personal information unless required for the above-mentioned Purposes. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting before disclosing any personal and sensitive personal data/ information by reaching out to the Sugmya's nearest branch or Sugmya's official contact number accessible on its website before making any disclosure.
- User shall only use the official website/links of Sugmya for availing product/services by inputting the domain information on the address bar.

## Retention of Information

Sugmya may retain User's Information if it is required to provide services or as long as it is required for business purpose. Retention of Information will be as per applicable law/regulatory requirements in India. Information may be retained for an extended period (i) in case of requirement of any investigations under law or as part of any requirement before Courts/Tribunals/Forums/Commissions etc. and (ii) to enhance / improve the products /services of Sugmya.

## Links to Third-Party Websites

This website safety of such other contains links to sites outside [www.sufinn.com](http://www.sufinn.com), Sugmya is not responsible for the privacy practices, the content, the authentic nature or websites and Our website links to third party sites which we do not operate or endorse. These websites may use cookies and collect your personal or non-personal information in accordance with their own privacy policies. This Privacy Policy does not apply to third-party websites and we are not responsible in any manner for third party websites.

## Governing Statute

This Privacy Policy is governed by and is compliant with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011, which is designed to protect Personal Information of the End-User(s) of the Services; and other applicable rules and regulations related to privacy.

## Security

Sugmya ensures to protect personally-identifiable information from loss, misuse, alteration or destruction. Only authorized Sugmya personnel are provided access to personally-identifiable information, and such employees are required to treat this information as confidential. Notwithstanding these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personally-identifiable information. Data security & privacy is a top priority at Sugmya.

## Governing Laws and Duties

You expressly understand and agree that the Company, including its directors, officers, employees, representatives or the service provider, shall not be liable for any direct, indirect, incidental, special, consequential or exemplary damages, including but not limited to, damages for loss of profits, goodwill, use, data or other intangible losses (even if the Company has been advised of the possibility of such damages), resulting from; (a) use or the inability to avail the Services (b) inability to use the Platform (c) failure or delay in providing the Services or access to the Platform (d) any performance or non-performance by the Company (e) any damages to or viruses that may infect your electronic devices or other property as the result of your access to the Platform or your downloading of any content from the Platform and (f) server failure or otherwise or in any way relating to the Services.

## Consent

By using this website [www.sufinn.com](http://www.sufinn.com) your consent to the collection, use and storage of your information by sugmya finance private limited in the manner described in this privacy policy. Sugmya Reserve the rights to make changes to this privacy policy from time to time.

We may also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

## Amendment of Privacy Policy

We reserve the right, at our discretion, to change, alter, modify, add, or remove portions from this Privacy Policy at any time so you are encouraged to review this Privacy Policy from time to time.

## Contact Us:

If you have any questions or suggestions or grievances regarding you can contact us at our support email address [support@sufinn.com](mailto:support@sufinn.com) or write to us at the following address:

### **SUGMYA FINANCE PRIVATE LIMITED**

602, 6th Floor, Plot No. 16, Rishabh Corporate Tower,  
Community Center, Karkardooma, Delhi-110092, India.

**You may also contact us on:** 011-40534543 (Monday-Saturday, 10 AM to 6 PM).

**Effective Date:** This Policy effective from the date of approval.

Director

Head- IT

Head- Internal Process & Policy