

PRIVACY POLICY

This document outlines the manner in which the details about you and your usage of our application are obtained and stored by MS FINCAP PRIVATE LIMITED (hereinafter referred to as “MSFC”, “we”, “us”, etc.), a Company incorporated under the provisions of the Companies Act, 2013, having registered office at C-81 B, Chaitanya Marg, C-Scheme Jaipur-302001 Rajasthan, having corporate identity number U67120RJ2016PTC055220. This policy also defines how we use such information and what are your related information collected by us about you.

This document is an electronic record in terms of Information Technology Act, 2000 and rules there under as applicable and the provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures to make the terms of this policy binding.

At www.msfincap.com data protection is a matter of trust and your privacy is very important to us. We use your personal information only in the manner set out in this Privacy Policy. Please read this privacy policy to learn more about our information gathering and dissemination practices.

This Privacy Policy explains how we gather personal information, classified as mandatory or optional as part of the normal operation of our services; and use, disclose and protect such information through the Site. This detailed privacy policy enables you to take informed decisions in dealings with us. Our parent, subsidiaries and joint ventures operate under similar privacy practices subject to the requirements of applicable law.

By availing our services you acknowledge your acceptance of the terms of this Privacy Policy, expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy and that any personal information provided by you through us is provided under a lawful contract. This Privacy Policy is incorporated into and subject to the terms of the User Agreement and/or all other policies and agreements published on our website.

We are extremely proud of our commitment to protect your privacy. We value your trust in us. We work hard to earn your confidence so that you can enthusiastically use our services and recommend your friends and family to participate in dealing with us. Please read the following policy to understand how your personal information will be treated as you make full use of our Site.

Our privacy policy is subject to change at any time without notice. To make sure you are aware of any changes, please review this policy periodically.

1. INFORMATION PROVIDED BY YOU WHICH WE COLLECT:

- I. You provide us information about yourself – Your Full Name, Username, E-mail Address. If you correspond with us by e-mail, we may retain the content of your e-mail messages, your e-mail address, and our responses. Additionally, we store information about user’s contact details when users manually enter contact e-mail addresses or transfer contact information from other online social networks. We also collect general information about your use of our services.

2. INFORMATION WE COLLECT AUTOMATICALLY WHEN YOU USE OUR SERVICES:

- I. When you access or use our Services, we automatically collect information about you, including:

- a) Usage Information: If you choose to communicate with us via any medium such as message areas or via e-mails, we retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities on our platform, we may collect such information into a file specific to you.
- b) Log Information: We log information about your use of our platform, including your device type and language, access times and your IP address.
- c) Device Information: We may collect information about the device you use to access our Services, including the hardware model, operating system and version, unique device identifier, phone number, International Mobile Equipment Identity ("IMEI") and mobile network information.
- d) Location Information: With your consent, we may collect information about the location of your device to facilitate your use of certain features of our Services such as location-based filters (such as local weather), and for any other purposes.
- e) Information Collected by Cookies and Other Tracking Technologies: We use various technologies to collect information, and this may include sending cookies to you. A "cookie" is a small data file transferred to your device's hard drive that allows an Application to respond to you as an individual, gathering and remembering information about your preferences in order to tailor its operation to your needs, likes and dislikes. Accepting a cookie does not provide us access to your device or any Personally Identifiable Information about you, other than the information you choose to share. Other servers cannot read them, nor can they be used to deliver a virus. If you

turn off cookies completely, there may be some features that will not be available to you. To support the personalized features of our platforms we must send a cookie to your computer's hard drive and/or use cookie-based authentication to identify you as a registered user. We do not, however, use so-called "surveillance" cookies that track your activity elsewhere on the Web.

3. HOW WE USE YOUR INFORMATION:

- I. We use the personal information we collect to fulfill your requests for services, improve our services, contact you, conduct research, and to obtain requisite information from government agencies to facilitate our services.
- II. When the User registers with the App, We will use the information supplied by the User to pull a credit report from a credit bureaus and identity verification services to facilitate banks and other financial institutions to evaluate the User's loan request in the context of the User's complete financial situation.
- III. We will also use the User information to enable activities and transactions that need to occur during the process of lending, such as:
 - i. Generating and maintaining User profiles on the App;
 - ii. Provide personalized features;
 - iii. Aiding financial services organizations to provide better services;
 - iv. Facilitating collection activities as needed;
 - v. Maintaining regular communications with the User concerning transactions the User initiates, such as requesting information or assistance, submitting a loan request, making payments, transferring funds, etc.
 - vi. Modifying the App from time to time to cater to the User's interests;

- vii. Providing the App and the functions and features therein, efficiently ;
- IV. By providing us your e-mail address, you consent to us using the e-mail address to send you our services related notices, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send notifications of activity on our platform to the e-mail address you give us, in accordance with any applicable privacy settings. We may use your e-mail address to send you other messages, such as newsletters, changes to our features, new services, events or other information. If you do not want to receive optional e-mail messages, you may modify your settings to opt out.
- V. Our settings may also allow you to adjust your communications preferences. If you do not wish to receive promotional email messages from us, you may opt out by following the unsubscribe instructions in those emails. If you opt out, you will still receive non-promotional emails from us about our Services.
- VI. Following termination or deactivation of your services, we may (but are under no obligation to) retain your information for archival purposes. We will not publicly disclose any of your personally identifiable information other than as described in this Privacy Policy.
- VII. At our sole discretion, for any reason or no reason at all, we reserve the right to remove any content or messages, if we believe that such action is necessary (a) to conform to the law, comply with legal process served on us or our affiliates, or investigate, prevent, or take action regarding suspected or actual illegal activities; to enforce this policy, to take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our Website or other platforms; or (c) to exercise or protect the

rights, property, or personal safety of the Website and other platforms, our users, or others.

- VIII. **Business Transfers:** As our businesses continue to evolve, we might sell one or more of our companies, subsidiaries or business units. In such transactions, personally identifiable information generally is one of the transferred business assets. In such event, this Privacy Policy may be amended as set forth below or the collection and uses of your personally identifiable information may be governed by a different privacy policy.
- IX. **Protection of Our Services and Others:** We reserve the right to release personally identifiable information to unaffiliated third parties when we believe its release is appropriate to comply with the law, enforce or apply our Terms and Conditions and other agreements. This includes exchanging information with other unaffiliated third parties in connection with fraud protection and credit risk reduction.
- X. **With Your Consent:** Other than as set out above, you will receive notice and have the opportunity to withhold consent when personally identifiable information about you might be shared with unaffiliated third parties.
- XI. We may transmit the user data across the various platforms of the Company.

4. HOW WE SHARE YOUR INFORMATION:

- I. As a matter of policy, we will not sell or rent information about you and we will not disclose information about you in a manner inconsistent with this Privacy Policy except as required by law or government regulation. We cooperate with law enforcement inquiries, as well as other third parties, to enforce laws such as those regarding fraud and other personal rights.

- II. We will not share the personal information we collect about you with any third party for their own marketing purposes. We may share your data with our services providers who process your personal information to provide services to us or on our behalf. We have contracts with our service providers that prohibit them from sharing the information about you that they collect or that we provide to them with anyone else, or using it for other purposes.
- III. You may decline to submit Personally Identifiable Information through the Services, in which case we may not be able to provide certain services to you. If you do not agree with our Privacy Policy, please discontinue use of our Service; your continued usage of the Service will signify your assent to and acceptance of our Privacy Policy and Terms of Use.
- IV. WE CAN (AND YOU AUTHORIZE US TO) DISCLOSE ANY INFORMATION ABOUT YOU TO LAW ENFORCEMENT, OTHER GOVERNMENT OFFICIALS, ANY LAWSUIT OR ANY OTHER THIRD PARTY THAT WE, IN OUR SOLE DISCRETION, BELIEVE NECESSARY OR APPROPRIATE IN CONNECTION WITH AN INVESTIGATION OF FRAUD, OR OTHER ACTIVITY THAT IS ILLEGAL OR MAY EXPOSE US, OR YOU, TO LIABILITY.

5. ENSURING INFORMATION IS ACCURATE AND UP-TO-DATE

- I. We take reasonable precautions to ensure that the Personal Information we Collect, Use and Disclose is complete, relevant and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:
 - i. Let us know if there are any errors in your Personal Information; and
 - ii. Keep us up-to-date with changes to your Personal Information such as your name or address.

6. HOW WE PROTECT YOUR INFORMATION:

- I. We are very concerned about safeguarding the confidentiality of your personally identifiable information. We employ administrative, physical and electronic measures designed to protect your information from unauthorized access.
- II. By using the Services or providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of this application or our Services.
- III. We use commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Information. Your sensitive information, such as credit information, is encrypted when it is transmitted to us. Our employees are trained and required to safeguard your information. We cannot, however, ensure or warrant the security of any information you transmit to us and you do so at your own risk. Using unsecured Wi-Fi or other unprotected networks to submit messages through the Service is never recommended. Once we receive your transmission of information, we make commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps.
- IV. Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud,

security or technical issues; or to protect our rights or property. However, nothing in this Policy is intended to limit any legal defenses or objections that you may have to a third party, including a government's, request to disclose your information.

- V. However, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. Please do not send us banking information and/or other sensitive information through e-mail. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us in accordance with the "Contact Us" section available on our Website or as provided at the end of this policy.

7. YOUR CHOICES ABOUT YOUR INFORMATION:

- I. You have several choices regarding use of information on our Services:
 - a) Email Communications: We will periodically send you free newsletters and e-mails that directly promote the use of our Website or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly. Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.
 - b) You may, of course, decline to submit personally identifiable information on our platform, in which case, we will not be able to provide our services to you.

8. RIGHTS OF THE DATA SUBJECT:

You have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- a. The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- b. The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- c. The right to object. You have the right to object to our processing of your Personal Data.
- d. The right of restriction. You have the right to request that we restrict the processing of your personal information.
- e. The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- f. The right to withdraw consent. You also have the right to withdraw your consent at any time where the platform relied on your consent to process your personal information.

g. Please note that we may ask you to verify your identity before responding to such requests.

9. STORING PERSONAL DATA:

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this policy. However, we may retain your Personal Data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

10. CHILDREN'S PRIVACY:

Our services are available only to persons who can form a legally binding contract with us as per the applicable laws. Protecting the privacy of young children is especially important. Thus, we do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to register. If you are under 18, please do not attempt to register for the Service or send any information about yourself to us, including your name, address, telephone number, or email address. No one under the age of 18 may provide any personal information for listing any service.

11. MERGER AND ACQUISITIONS:

In case of a merger or acquisition, we reserve the right to transfer all the information, including personally identifiable information, stored with us to the new entity or company thus formed. Any change in the Website's policies and standing will be notified on the website or via e-mail.

12. NOTIFICATION PROCEDURES:

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via e-mail notice, written or hard copy notice, or through conspicuous posting of such notice on the Website, as determined by us in our sole discretion. We reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

13. OPTING OUT OF INFORMATION SHARING:

- I. We understand and respect that not all users may want to allow us to share their information with other agencies in order to fulfill your request for services. In such cases we will not be able to provide our services. If you do not want us to share your information, please contact us through the "Contact Us" page, and we will remove your name from lists we share with other entities as soon as reasonably practicable. When contacting us, please clearly state your request, including your name, mailing address, e-mail address and phone number.
- II. However, under the following circumstances, we may still be required to share your personal information:
 - a) If we respond to court orders or legal process, or if we need to establish or exercise our legal rights or defend against legal claims.
 - b) If we believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use or as otherwise required by law.

c) If we believe it is necessary to restrict or inhibit any user from using any of our Website or application, including, without limitation, by means of "hacking" or defacing any portion thereof.

14. PHISHING OR FALSE E-MAILS:

If you receive an unsolicited e-mail that appears to be from us or one of our members that requests personal information (such as your credit card, login, or password), or that asks you to verify or confirm your account or other personal information by clicking on a link, that e-mail was likely to have been sent by someone trying to unlawfully obtain your information, sometimes referred to as a "phisher" or "spoofer." We do not ask for this type of information in an e-mail. Do not provide the information or click on the link. Please contact us at 0141-4036554 if you get an e-mail like this.

15. CHANGES TO OUR PRIVACY POLICY:

We may update this Privacy Policy and information security procedures from time to time. If these privacy and/or information security procedures materially change at any time in the future, we will post the new changes conspicuously on the Website to notify you and provide you with the ability to opt out in accordance with the provisions set forth above. Continued use of our platform and services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

16. BREACH OF PRIVACY POLICY:

We reserve the right to terminate or suspend your usage of this Website immediately if you are found to be in violation of our privacy policy. We sincerely request you to respect

privacy and secrecy concerns of others. The jurisdiction of any breach or dispute shall be India.

17. NO RESERVATIONS:

We do not accept any reservation or any type of limited acceptance of our privacy policy. You expressly agree to each and every term and condition as stipulated in this policy without any exception whatsoever.

18. NO CONFLICT:

The policy constitutes a part of the user terms. We have taken utmost care to avoid any inconsistency or conflict of this policy with any other terms, agreements or guidelines available on our Website. In case there exists a conflict, we request you to kindly contact us for the final provision and interpretation.

19. GRIEVANCE OFFICER:

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of our Grievance Officer are provided below:

Name: Shridhar Modi

Address: C-81 B, Chaitanya Marg, C-Scheme Jaipur-302001 Rajasthan

Telephone: 0141-4036554

E-mail: info@msfincap.com

20. CONTACT US:

If you have any questions about this Privacy Policy, our practices relating to the website or mobile application, or your dealings with us, please contact the Privacy Team at: 0141-4036554.