

KARNATAKA VIKAS GRAMEENA BANK
(KVGB)

Right to Information Act, 2005

Disclosure Policy

Disclosure Policy
Under
Right to Information Act, 2005

TABLE OF CONTENTS	
Policy Statement	
DIVISIONS	
1	INFORMATION TECHNOLOGY DIVISION (IT)
2	PERSONNEL & HUMAN RESOURCE DEVELOPMENT DIVISION
3	INSPECTION DIVISION
4	LAW AND RECOVERY DIVISION
5	PREMISES AND MAINTENANCE DIVISION
6	FINANCIAL INCLUSION DIVISION
7	PLANNING AND DEVELOPMENT DIVISION
8	ACCOUNTS DIVISION
9	VIGILANCE DIVISION
10	ADVANCE DIVISION
11	BOARD SECRETARIAT

DISCLOSURE POLICY OF KARNATAKA VIKAS GRAMEENA BANK

Right to Information Act 2005 (RTI), is not only about the right to know but also about the right to questions which, in turn, increases the transparency and accountability and also strengthen the democracy. KVGB considers disclosure of information under RTI as a very important responsibility and has a positive bias towards disclosure and increased transparency. In fact, KVGB use RTI as a tool of governance.

KVGB has been proactively disseminating information, not only in compliance with the requirements of the Act, but also with the objective of achieving better corporate governance through greater transparency and accountability. It may, however, be stated that KVGB being the financial institution receives and holds a lot of sensitive information, the disclosure of which may not, at all times, be in the public interest.

Similarly, KVGB is also privy to personal information pertaining to its employees as well as other, such as customers, borrowers, consultants, advisors contractors, bidders and other agencies etc., and disclosure of such personal information would not only compromise the privacy of the concerned individuals, but also, in some extreme cases may endanger their life / security. Such information is considered as exempt from disclosure under the provisions of RTI Act.

A list of such information which cannot be disclosed either wholly or partially is furnished below. The list is only indicative and not exhaustive, which may be revised periodically.

1. INFORMATION TECHNOLOGY DIVISION (IT)

S N	Particulars of Information that cannot be disclosed	Enabling provisions under RTI Act
1	Details of software developed, implemented and used in the Bank, which is proprietary to the Bank.	Exempt under section 8 (1) d
2	Location of systems, distribution of systems and architecture of the applications, network architecture and network diagrams. Physical security of computer financial system/networks.	Exempt under section 8 (1) d
3	Backup arrangements at various data centers Business Continuity Plan	Exempt under section 8 (1) d
4	Disaster Recovery Management of the Bank for running the various applications.	Exempt under section 8 (1) d
5	Security - Financial and non-financial classified transactions performed on a computer /computer systems/networks in the data centers	Exempt under section 8 (1) d
6	Encrypted Message /data, transactions and system of encryption relating to financial and non-financial transactions flowing in and out of the Bank's systems.	Exempt under section 8 (1) d
7	Audit trails/computer logs and access controls systems and data.	Exempt under section 8 (1) d
8	IT related policies and SOPs of the Bank	Exempt under section 8 (1) d
9	Details of critical IT assets	Exempt under section 8 (1) d
10	Source code review reports and VAPT reports	Exempt under section 8 (1) d

2. PERSONNEL & HUMAN RESOURCE DEVELOPMENT DIVISION

S.N	Particulars of Information that cannot be disclosed	Enabling provisions under RTI Act
1	Copies of representations /information contained in such representations in connection with transfer, promotion, regularization of absence etc.	Exempt under Section 8 (1) (j)
2	Transfer Request letters / representations / records and connected notings and correspondence received from officers.	Exempt under Section 8 (1) (j)
3	Third party personal information appearing in officenotes.	Exempt under Section 8 (1) (j)
4	Details of other employee's service details / representations of third parties and connected notings & correspondence.	Exempt under Section 8 (1) (j)
5	Details of different nominations made by the employeesought by third party.	Exempt under Section 8 (1) (j) & (e)
6	List of employees of doubtful integrity.	Exempt under Section 8 (1) (e), (h) & (j)
7	Agreed list of employees formulated in consultation with the Central Bureau of Investigation.	
8	Complaints which includes the name of the complainant, nature of complaint and the individual / authority against which complaint has been made.	Exempt under Section 8 (1) (e), (g), (h) & (j)
9	Property statement and particulars of properties ofemployees	Exempt under Section 8 (1) (e) & (j)
10	Information/papers pertaining to departmental enquiries sought by third parties where proceedings are pending before Disciplinary Authorities / Appellate Authority or any judicial / quasi-judicial authorities.	Exempt under Section 8 (1) (h)
11	Performance Appraisal Report (PAR) including marks, service file and property folder details of the employees sought by third party.	Exempt under Section 8 (1) (e) & (j)

12	<p>Personal Details of the employee (other than self) such as</p> <ul style="list-style-type: none"> a Various deduction from salary including quantum b Bank Account Details c Amounts of loans and advances availed d Information relating to movable/immovable properties e The nature of illness f Information relating to LFC except the amount reimbursed. g Names of dependents for claiming various facilities. h Residential address, phone number etc. 	Exempt under Section 8 (1) (e) & (j)
13	<p>Details of Superannuation benefits like Provident Fund, Gratuity, Encashment of leave, commuted value of pension paid to individuals (except to legal heirs in case of death). Also, information on compassionate package paid on behalf of individuals</p>	Exempt under Section 8 (1) (e) & (j)
14	<p>Nominee details of the employees towards Provident Fund, Gratuity, Group Savings Linked Insurance (GSLI) etc. to third parties</p>	Exempt under Section 8 (1) (e) & (j)
15	<p>Information relating to bidder</p> <ul style="list-style-type: none"> a Information relating to bids till a decision is taken b Information relating to rejected bids c Personal information relating to bidders 	Exempt under Section 8 (1) (d) (e) & (j)
16	<p>Any information related to the services /work/ products treated as confidential by bidder /service provider /contractor</p>	Exempt under Section 8 (1) (d)
17	<p>Banks Internal Exam marks and interview marks of candidates (other than that of information seeker.)</p>	Exempt under Section 8 (1) (j)
18	<p>Personal details of leave application such as nature of sickness etc. of the employee sought by third party. Details of nominations made by the employee, but sought by third party.</p>	Exempt under Section 8 (1) (e)

3. INSPECTION DIVISION

S.N.	Particulars of information that cannot be disclosed	Enabling provision under RTI Act, 2005
1	Internal notes including Agenda papers of the meeting of the Board/Committees (Pertaining to formation of policies)	Exempt under Section 8(1) (a)
2	<p>Policies</p> <ul style="list-style-type: none"> ➤ Comprehensive policy for Internal Inspection ➤ Operational Risk Management Policy ➤ AML/KYC Policy ➤ Empanelment of Retired Officer's Policy 	Exempt under Section 8(1) (d)
3	Inspection/Audit reports and any information and any information derived from these reports	Exempt under Section 8(1) (a) & (d) Information will be furnished to the extent possible after exercising the severability clause under section 10 of the Act.
4	Compliance on Inspection reports	
5	Minutes/proceedings of Audit Committee of Board/Risk Management Committee Meeting	
6	Copies of the Agreement/Consent/Acceptance signed with Concurrent Auditors/Empanelled Retired Officers	Exempt under Section 8 (1) (a) & (e)
7	Movement/ tour details and TA Bills of officials working in Inspection Department	Exempt under Section 8 (1) (g)
8	Rating of Branches	Exempt under Section 8(1) (a) & (d)

4. LAW AND RECOVERY DIVISION

S. N.	Particulars of information that cannot be disclosed	Enabling provisions under RTI Act, 2005
1.	Legal opinion furnished by Law Department and notes and papers, briefs received from various HO Departments and ROs	Notings/ Legal opinions can be disclosed except those which contain information exempted from disclosure under Section 8 of RTI Act, 2005
2.	Pleading, affidavits, Memorandum and other papers filed before the Judicial/ Quasi -judicial authorities and draft prepared in that regard and correspondence with Bank's advocate/ Senior Counsels	Exempt under Section 8 (1) (e)
3.	Correspondence with Govt. or Govt. agencies or Banks or statutory agencies or regulated entities with respect to policy or proposed decision or drafting of a bill/ regulation/ rule, etc. in connection with any proposed action	Exempt under Section 8 (1) (e)
4	Information relating to One Time Settlement, Loan Recovery Policy, Other Policy documents and internal guidelines and other communications	Exempt under Section 8 (1) (d)

5. PREMISES AND MAINTENANCE DIVISION

S. N	Particulars of information that cannot be disclosed	Enabling Provisions of the RTI Act, 2005
1	Information relating to bidders <i>(i)</i> Information relating to bids till a decision is taken <i>(ii)</i> Information relating to rejected bids <i>(iii)</i> Personal information relating to bidders	Exempt under Section 8 (1) (d) & (e) & (j)
2	Any information related to the services/work/products treated as confidential by bidder/service provider/contractor in his own Business interest.	Exempt under Section 8 (1) (d)
3	Committee reports such as Enquiry Report, CVC Report till action is complete	Exempt under Section 8 (1) (h)
4	Building plans/floor plans and other infrastructures systems and arrangements sensitive from security point of view	Exempt under Section 8 (1) (a) and Section 9
5	Correspondence entered with banks and other entities in fiduciary capacity	Exempt under Section 8 (1) (a) and (e)
6	Any information of data received by Department in Fiduciary capacity	Exempt under Section 8 (1) (e)

6. FINANCIAL INCLUSION DIVISION

S.N.	Particulars of information that cannot be disclosed	Enabling provision under RTI Act, 2005
1	Financial Inclusion Fund (FIF) Information relating to grant received from NABARD with respect to FLC programs. Incentives received from PFRDA for APY. Incentives paid for canvassing Social Security Scheme.	Exempt under section 8(1)(d)
2	Financial Inclusion Fund Information regarding Bank details etc. to whom we extend financial assistance.	Considered personal information and therefore exempt under Section 8 (1) (j)
3	Any information related to the services/work/products treated as confidential by bidder/service provider in his own Business interest.	Exempt under section 8(1)(d)

7. PLANNING AND DEVELOPMENT DIVISION

S. N	Particulars of information that cannot be disclosed	Enabling Provisions of the RTI Act, 2005
1	Copy of Business Plan/MOU, Copy of agreements signed with any institutions/ State Govt./ Central Govt., Correspondence done with RBI, NABARD, Sponsor Bank, other outside agencies and with customers which are in fiduciary capacity.	Exempt under Section 8 (1) (e)
2	Third party personal information about our customers that is available with banks/ received from banks in a fiduciary capacity	Exempt under Section 8 (1) (e)(j)
3	Information/ Documents related to commercial confidence, trade secrets of proposals received from third parties unless Competent Authority is satisfied that larger public interest warrants disclosure of such information.	Exempt under Section 8 (1) (d)
4	Complaints which includes the name of the complainant, nature of complaint and the individual/ authority against which the complaint has been made.	Exempt under Section 8 (1) (g)(j)
5	Any third party personal information appearing in office notes, data, opinion by experts or external agencies, Office notes, Agenda papers, minutes of any meeting available in the Bank in any form which are in Fiduciary capacity	Exempt under Section 8 (1) (e)(j) Exempt under Section 8 (1) (d) information will be furnished to the extent possible after exercising the severability clause under Section 10 of the Act.
6	Policy documents and internal guidelines, manuals, circulars and communications.	Exempt under Section 8 (1) (d)
7	Documents related to commercial confidence, trade secrets of proposals that have been received from third party unless CPIO is satisfied that larger public interest warrants disclosure of such information.	Exempt under Section 8 (1) (e)

8. ACCOUNTS DIVISION

S. N	Particulars of information that cannot be disclosed	Enabling Provisions of the RTI Act, 2005
1	Call/Term/Notice Money – Transaction-wise data, except to the extent published	Exempt under Section 8 (1) (d) & (e)
2	Market repo-Transaction-wise data, except to the extent published	Exempt under Section 8 (1) (d) & (e)
3	Liquidity Adjustment Facility (LAF) Transaction-wise data, except to the extent published	Exempt under Section 8 (1) (d) & (e)
4	Government securities and Treasury Bills Transaction-wise data, except to the extent published	Exempt under Section 8 (1) (d) & (e)
5	All type of Audit reports such as Operational, Concurrent, Inspection, Special, Security, Information System & Management Audit of Branches / ROs / HO or any information derived from these reports. Compliance on Audit reports	Exempt under Section 8(1) (a) & (d) Information will be furnished to the extent possible after exercising the severability clause under section 10 of the Act.
6	All Memorandum submitted to Audit Committee and Board from time to time	Exempt under Section 8(1) (d)
7	All Income Tax Returns /Appeals / Litigations file before IT authorities	Exempt under Section 8(1) (e)

9. VIGILANCE DIVISION

S. N	Particulars of information that cannot be disclosed	Enabling Provisions of the RTI Act, 2005
1	Third party personal information appearing in Office Notes	Exempt under Section 8 (1) (j)
2	Agreed list of employees formulated in consultation with the Central Bureau of Investigation	Exempt under Section 8 (1) (j)
3	Movement / tour details and TA bills, of the officers/ officials working in the Vigilance Division	Exempt under Section 8 (1) (g)
4	Individual details of Frauds – Names of fraudulent borrowers, current status of fraudulent activity. Statistics of frauds with KVGB, Internal Policy of frauds, Investigation / special audit reports in respect of fraud cases	Exempt under Section 8 (1) (d) Information will be furnished to the extent possible after exercising the severability clause under section 10 of the Act.
5	Investigations pending final decision, names and other details of the investigating officials.	Exempt under Section 8(1)(g), (h) & (j)
6	Information / papers pertaining to departmental enquiries sought by third parties where proceedings are pending before Disciplinary Authorities / Appellate Authority or any judicial / quasi-judicial authorities. Reports of all Investigation ordered by CVO,	Exempt under Section 8(1)(h)
7	Agenda and Minutes of all Vigilance meetings, Notings made by CVO,	Exempt under Section 8(1)(g), (h)
8	Correspondence with external government agencies like CVC, DFS, CBI, RBI, etc, Correspondence / Advisory notes between CVC and CVO	Exempt under Section 8(1)(e) (h)

10. ADVANCE DIVISION

S. N	Particulars of information that cannot be disclosed	Enabling Provisions of the RTI Act, 2005
1	Details of project proposals from NGOs/Institutes/Agencies etc. being in the nature of intellectual property right disclosure of which will harm competitive nature of the third party	Exempt under Section 8 (1)(d)
2	Information regarding Bank details etc. to whom we extend financial assistance.	Exempt under Section 8(1)(j)
3	Rating of NGOs	Exempt under Sec 8 (1) (d) to third parties. Ratings parameters are already in public domain.
4	Annual reports, financial details, registration details etc. of a third party obtained by us in connection with consideration of a project proposal in our fiduciary capacity.	Exempt under section 8 (1) (e)
5	Specific Terms and conditions pertaining to sanction of particular innovative project sanctioned to a particular agency/borrower, etc.	Exempt under Sec 8 (1) (d)
6	Third party personal information about individual borrowers that is available with the banks / received from the banks in a fiduciary capacity.	Exempt under Section 8 (1) (e) and (j)
7	Correspondence with borrowers	Exempt under Section 8 (1) (e)
8	Such Information furnished by borrower entities that have not been disclosed to public by them in Annual Reports, etc.	Exempt under Section 8 (1) (e) and (j)
9	Structural plans/ infrastructure systems /Building plans / floor plans and arrangements sensitive from security point of view in the case of infrastructure projects.	Exempt under Section 8 (1) (a) and Section 9
10	Internal notes including agenda papers of the meetings of the Board /Management Committee pertaining to formulation of policies.	Exempt under Section 8 (1) (a)

11	Opinions furnished by Legal advocate or any other external agency which will aid in taking a decision about the project.	Exempt under Section 8 (1) (e)
12	Information on investment proposals, till the action is complete.	Exempt under Section 8 (1) (d)
13	Copy of the loan agreement and other agreements signed by the borrowers / agencies / eligible institutions for obtaining assistance from Bank under various activities.	Exempt under Section 8 (1) (d)
14	Information provided to Government / parliament in connection with Parliament questions before it is laid before the Parliament.	Exempt under Section 8 (1) (c)
15	Information/Documents related to commercial confidence , trade secrets of the proposals that have been received from third party unless competent authority is satisfied that larger public interest warrants, disclosure of such information	Exempt under Section 8 (1) (d)
16	Any information on data received by the Department in Fiduciary capacity.	Exempt under Section 8 (1) (e)
17	Copy of the agreement signed by Bank with various agencies / NGOs/ Fin-tech companies/eligible institutions for Advances related activities.	Exempt under Section 8 (1) (d)
18	Agreements signed with external and such other agencies which would adversely affect the interest of both the parties.	Exempt under Section 8 (1) (a) & (f)
19	Information available in the Department in a fiduciary capacity like details of legal opinion, scrutiny note given by Law Department and information related to RBI/ Central/ State Govt/ Banks/ other eligible institutions.	Exempt under Section 8 (1) (e)
20	Names of Banks/agencies and quantum of refinance/credit limit availed by our Bank from any of the eligible financial institutions by way of refinance assistance.	Exempt under Section 8 (1) (d) (e)
21	Names and addresses of Banks/agencies and the loans/refinance sanctioned by them, outstanding status of account, status of the financial position of the agency etc. in respect of the co-finance proposals availed by our Bank.	Exempt under Section 8 (1) (d) (e) (g)

22	Details of client-wise loans converted/rescheduled/ rephrased and client wise outstanding there against.	Exempt under Section 8 (1) (d) (e)
23	Any issue or matter which is in the process of finalization, the disclosure of which may impact the scheme or idea.	Exempt under Section 8(1)(d)
24	Detailed Project Reports submitted by various clients	Exempt under Section 8 (1) (d) and Section 9
25	Correspondence with borrowers if asked by third party.	Exempt under Section 8(1)(e)
26	Copy of the agreements signed by the borrowers/agencies/eligible institutions for obtaining assistance from KVGB under various Funds.	Exempt under Section 8(1)(e)
27	Restructuring Memorandum placed before various sanctioning committee	Exempt under Section 8(1)(d)(e)
28	Agreement signed with external and such other agencies which would adversely affect the interest of both parties.	Exempt under Section 8(1)(d)(e)
29	Borrower wise information of Restructured advances cannot be disclosed except that is required to be published as per the regulatory norms.	Exempt under Section 8(1)(d)

11. BOARD SECRETARIAT

S. N	Particulars of information that cannot be disclosed	Enabling Provisions of the RTI Act, 2005
1	Agenda notes, minutes of the meeting and resolutions by the Board and its sub-committees	Exempt under Section 8 (1)(d)
2	Personal details of Directors on the Board and Ex- Directors	Exempt under Section 8(1)(e)(j)
3	Information relating to Board Meeting	Exempt under Section 8 (1)(d)