

Vivriti Capital Limited

Data Protection Policy

Version 3.0



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Note: This policy is the revamped version of older version (V1.x) to meet the technology, regulatory and compliance requirement.

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1. Purpose

Vivriti Capital Limited, being a responsible Non-Banking Financial Company (NBFC) registered in India, is committed to protecting and respecting the privacy and security of the personal data of our customers, employees, and stakeholders. This Data Protection Policy outlines our commitment to managing, protecting, and processing personal data in alignment with the ISO 27701:2019, ISO 27001:2022, the Digital Personal Data Protection (DPDP) Act 2023, and the Reserve Bank of India's guidelines on Digital Lending.

2. Scope

This policy applies to all personal data collected, processed, and stored by Vivriti Capital Limited during the course of our business operations, including co-lending activities, and extends to our employees, contractors, partners, and customers.

3. Principles

3.1. Data Protection and Privacy

We ensure data privacy by implementing appropriate technical and organizational measures, ensuring confidentiality, integrity, availability, and resilience of processing systems and services.

3.2. Lawful and Fair Processing

Personal data is processed lawfully, fairly, and transparently, ensuring individuals' rights. The processing is limited to purposes specified, explicit, and legitimate.

3.3. Data Minimization and Limitation

We collect and process personal data that is adequate, relevant, and limited to what is necessary for the intended purposes.

3.4. Accuracy

Personal data shall be accurate, complete, and kept up to date with every effort to erase or rectify without delay.

3.5. Consent

We obtain clear and unambiguous consent for collecting, processing, and sharing personal data, ensuring individuals' rights to withdraw consent.

4. Data Subject Rights

In adherence with the DPDP Act 2023 and other relevant regulations, data subjects are entitled to specific rights concerning their personal data. These rights empower individuals to have control over their data that Vivriti Capital Limited collects, processes, and stores. The following are the elaborated rights:

4.1. Right to Access:

Data subjects have the right to obtain confirmation on whether their personal data is being processed, accessed, or stored. They can request a copy of their data and inquire about the purposes of the processing, categories of personal data involved, and the recipients or categories of recipients to whom the personal data has been or will be disclosed.

4.2. Right to Rectification:

If the personal data we hold is inaccurate or incomplete, data subjects have the right to have it corrected. We take reasonable steps to ensure that inaccurate data, considering the purposes for which they are processed, are erased or rectified without delay.

4.3. Right to Erasure ('Right to be Forgotten'):

Data subjects can request the deletion or removal of personal data where there is no compelling reason for its continued processing. This includes situations where the individual withdraws consent, or the data is processed unlawfully.

4.4. Right to Restriction of Processing:

Individuals have the right to 'block' or suppress the processing of their personal data under certain conditions. When processing is restricted, we are permitted to store the personal data but not process it further.

4.5. Right to Data Portability:

Data subjects have the right to obtain and reuse their personal data for their purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way.

4.6. Right to Object:

Data subjects have the right to object to the processing of their personal data based on legitimate interests or the performance of a task in the public interest/exercise of official authority, direct marketing, and processing for purposes of scientific/historical research and statistics.

4.7. Rights Related to Automated Decision Making and Profiling:

Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

4.8. Right to Withdraw Consent:

Where the processing activities are based on consent, data subjects have the right to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

4.9. Right to Lodge a Complaint:

Data subjects have the right to lodge a complaint with a supervisory authority, particularly in the Member State of their habitual residence, place of work, or place of the alleged infringement if

the data subject considers that the processing of personal data relating to him or her infringes regulations.

At Vivriti Capital Limited, we are committed to enabling these rights and have established internal processes to facilitate the exercise of these rights by data subjects. For exercising these rights, data subjects can contact our Data Protection Officer at [DPO's Email Address], who will guide through the process and ensure compliance with the legal timeframes.

5. Security Measures

5.1. ISO 27701:2019 & ISO 27001:2022

We are compliant with the requirements outlined in the ISO standards, ensuring a comprehensive approach to information security and privacy management.

5.2. Technical and Organizational Measures

We employ advanced technologies, security protocols, and internal procedures to protect personal data from unauthorized access, disclosure, alteration, and destruction.

6. Data Sharing and Transfer

6.1. Co-Lending Partners

In our co-lending business model, we take steps to ensure that our partners adhere to the same stringent data protection standards, protecting customer's data as per the regulatory guidelines.

6.2. International Data Transfer

We ensure that personal data transferred outside India is afforded an adequate level of protection, in compliance with the DPDP Act 2023.

7. Legal and Regulatory Compliance

7.1. DPDP Act 2023

We strictly adhere to the requirements of the DPDP Act 2023, implementing measures to ensure transparency, security, and accountability in our data processing activities.

7.2. RBI Digital Lending Guidelines

We comply with RBI's operational guidelines on digital lending, ensuring fair treatment, transparency, and privacy of customer's data.

8. Audit and Review

Regular audits and reviews are conducted to ensure compliance with this policy, regulatory requirements, and continuous improvement in our data protection and privacy management system.

9. Grievance Redressal

We are committed to addressing grievances in a timely and efficient manner. For queries or concerns, you can write to infosec@vivriticapital.com and the team will respond to the same. The responsibilities of DPO are carried out by the head of Information Security.

10. Amendments

Vivriti Capital Limited reserves the right to amend this policy at any time. The revised policy will be made available on our official website and communicated to data subjects where applicable.

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