

Vivriti Capital Limited

# Data Privacy Policy

Version 3.0



vivriti  
CAPITAL

Project/ Track Name	Vivriti Capital
Document Name	Data Privacy Policy
Document No	ISP-13
Revision no	3.0
Object Type	Policy Document

Revision History						
Version	Author	Date	Affected Sections	Reviewer	Approver	Approval Status
2.0	Lakshmi Balaji	06-10-2022	All	Prasenjit Datta	ISMGC	Approved by board on 08-Nov-2022
3.0	Goutham Vaidyanathan /Lakshmi Balaji	5-10-2023	All	Prasenjit Datta		Approved by board on 03-Nov-2023

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

Distribution	
Role	Department
All	All

Table of Contents

Important Note: .....	3
1. Purpose .....	4
2. Scope.....	4
3. Data Protection Principles .....	4
3.1. Lawfulness, Fairness, and Transparency.....	4
3.2. Purpose Limitation .....	4
3.3. Data Minimization.....	4
3.4. Accuracy.....	4
3.5. Storage Limitation.....	4
3.6. Integrity and Confidentiality .....	5
3.7. Accountability .....	5
4. Data Collection and Processing.....	5
5. Data Subject Rights .....	5
6. Security .....	5
7. Data Transfers and Co-lending.....	6
8. Third-Party Processors.....	6
9. Data Privacy Impact Assessments (DPIA) .....	6
10. Training and Awareness.....	6
11. Compliance and Certification.....	6
12. Review and Revision .....	6
13. Contact Information.....	6
14. Conclusion.....	6

**Important Note:** This document is intended solely for the use of the individual or entity to whom it is transmitted to, and others authorized to receive it. It may contain confidential or legally privileged information. If you are not the intended recipient you are hereby notified that any disclosure, copying, distribution or taking any action in reliance on the contents of this document is strictly prohibited and may be unlawful. If you have received this document in error, please notify us immediately.

## 1. Purpose

Vivriti Capital Limited (hereafter referred to as “we”, “us”, or “our”) is steadfast in its commitment to safeguarding the privacy and security of personal data. This Data Privacy Policy underscores our unwavering dedication to data privacy, confirming our alignment with ISO 27001:2022, ISO 27701:2019, Indian privacy law, and the digital lending guidelines stipulated by the Reserve Bank of India (RBI).

## 2. Scope

This policy is pertinent to all personal data that we collect, process, or store and is applicable to all employees, contractors, and third parties who are entrusted with the processing of this data on our behalf.

## 3. Data Protection Principles

We strictly adhere to the data protection principles below:

### 3.1. Lawfulness, Fairness, and Transparency

We are committed to processing all personal data in a lawful, fair, and transparent manner. We ensure that every data processing activity is backed by a legal basis, such as consent or a contractual obligation. Transparency is maintained by providing clear, accessible, and understandable information to data subjects about how their data is being used, and ensuring their rights can be easily exercised.

### 3.2. Purpose Limitation

We collect personal data strictly for identified, explicit, and legitimate purposes. Data is not further processed in any manner that is incompatible with those purposes. We clearly inform the data subjects of these purposes at the point of collection to ensure informed consent and understanding.

### 3.3. Data Minimization

We adhere to the principle of data minimization, ensuring that only data that is necessary for the intended purposes is collected and processed. This minimizes privacy risks and ensures that no excessive data is retained. We continually review our processes to uphold this principle.

### 3.4. Accuracy

Accuracy of personal data is paramount. We have mechanisms in place to ensure that inaccurate or outdated data is amended or deleted promptly. Data subjects are encouraged and facilitated to update their data periodically to ensure it remains accurate and current.

### 3.5. Storage Limitation

We retain personal data for a limited period, only as long as necessary to fulfill the purposes for which the data was collected or to comply with legal, regulatory or policy requirements. We have established clear data retention policies and procedures to ensure that data is securely deleted, anonymized, or archived after the retention period.

### 3.6. Integrity and Confidentiality

Personal data is protected by suitable security measures designed to prevent unauthorized access, alteration, disclosure, or destruction. These include technological, organizational, and procedural measures such as encryption, access controls, and staff training to ensure the confidentiality and integrity of data.

### 3.7. Accountability

We are committed to being accountable for our data protection practices. We have internal policies, procedures, and controls in place to ensure and demonstrate compliance with data protection principles. These include regular audits, training, and a dedicated data protection officer to oversee compliance.

## 4. Data Collection and Processing

We commit to:

- Informing individuals regarding their data's collection and processing.
- Only collecting data for specific and legitimate purposes.
- Ensuring data accuracy and updating it as necessary.
- Storing data securely to maintain its confidentiality.

## 5. Data Subject Rights

We respect data subject rights including:

- Access to personal data.
- Rectification of inaccurate data.
- Erasure or the "right to be forgotten."
- Restricting data processing.
- Data portability.
- Objection to processing.
- Not being subject to automated decision-making.

## 6. Security

We have instituted security measures to protect personal data, including:

- Assigning the appropriate classification for PII data.
- Implementing access controls.
- Encrypting data during transmission and at rest.
- Masking and redacting PII as per requirements to ensure enough access control and protection.
- Regularly monitoring and testing security protocols.
- Establishing incident response and breach notification procedures.

## 7. Data Transfers and Co-lending

In cases of data transfers outside India or to our co-lending partners, we ensure that adequate safeguards, confidentiality, and security measures are in place, in alignment with ISO27701, Indian privacy law, and RBI guidelines.

## 8. Third-Party Processors

We take steps to ensure that third-party processors adhere to our data protection and privacy requisites.

## 9. Data Privacy Impact Assessments (DPIA)

DPIAs are conducted for processing operations that pose specific risks to data subjects' rights and freedoms and to assess the overall privacy impact that Vivriti may have.

## 10. Training and Awareness

Employees receive periodic training as per the information security and privacy awareness policy, and we foster awareness regarding data privacy and protection.

## 11. Compliance and Certification

We continuously assess and seek certifications, such as ISO 27001:2022 and ISO 27701:2013, to ensure compliance.

## 12. Review and Revision

This policy is subject to annual review or updates upon significant changes in data processing activities.

## 13. Contact Information

For queries or concerns, you can write to [infosec@vivriticapital.com](mailto:infosec@vivriticapital.com) and the team will respond to the same. The responsibilities of DPO are carried out by the head of Information Security.

## 14. Conclusion

We are committed to upholding the highest standards of data privacy and security, with continuous improvements to align with legal and regulatory requirements and industry standards.

----- End of Document -----