COMFORT FINCAP LIMITED

DATA PRIVACY POLICY

December 2025

Version.1.0

1. **Scope**

This Data Privacy Policy outlines how Comfort Fincap Limited ("CFL", "the Company", "we") collects, uses, stores, and disclose personal information in a fair, transparent and secured way.

This policy is applicable to all the existing customers, potential customers and individuals ("User", "You" or "Your") who visit the office/branch and/or any 'Digital Property' owned by Comfort Fincap Limited.

The term Digital Property refers to our website. It excludes independent data held by third-parties, but includes:

- Personal information collected or processed by third parties on behalf of the Company; and access by the Company.

2. **Objective**

This Privacy Policy outlines the types of user information CFL collects, the consent involved, the purposes for which the information is used, and other key aspects. Users are encouraged to review this Policy periodically to remain informed about updates or changes.

The Company is committed to protecting individuals' privacy rights and ensuring that all personal information it handles is safeguarded against unauthorized access, use, storage, or disclosure. This commitment is a key responsibility shared by the Company's employees and any third parties acting on its behalf.

3. Consent

By accessing our website and by using the products or services offered by CFL and its group entities, the User agrees to the following:

- Acceptance of this Privacy Policy along with the terms of use applicable to the website and product-related documents.

- Permission for CFL to collect information required for processing loans, placing Fixed Deposits (FDs), and facilitating third-party products such as mutual funds, insurance, and similar offerings.

- Consent to collect data for Aadhaar-based authentication or verification (Aadhaar eKYC/OKYC/cKYC) as enabled by UIDAI, including accessing, verifying, updating, or uploading KYC details with the Central KYC Registry (CERSAI), and retrieving information from Digi locker as provided by the Ministry of Electronics and Information Technology (MeitY).

- Agreement to receive marketing and promotional communications.

- Permission to store information in accordance with the Company’s policies as well as applicable legal and regulatory requirements.

- Consent for e-Mandate registration using e-Signature.

Further, CFL, or third parties duly authorized by CFL, may utilize your information for the provision, management, and enhancement of our services. Such use may include, but is not limited to:

- Conducting KYC procedures
- Assessing creditworthiness and performing risk evaluations
- Verifying information submitted by you
- Addressing complaints, claims, or disputes
- Detecting, preventing, and investigating fraud or other unlawful activities

- Developing, validating, and improving credit risk models, products, and service features
- Facilitating recovery of outstanding dues
- Identifying, diagnosing, and resolving technical issues
- Communicating with you through email, SMS, postal correspondence, or telephone for notices, alerts, support, and administrative purposes
- Maintaining records and complying with applicable legal, regulatory, and judicial requirements.

Any unauthorized or unlawful use of personal information is strictly prohibited.

4. Web Application ("Comfort Fincap") Permissions

If you access the Company's Web Application, we may request certain device permissions to enable specific functionalities in accordance with applicable laws and regulations. These permissions help ensure a smooth and seamless user experience on our platform.

The Company's application may use the following device-level permissions:

Sr. No.	Permission	Description	Permission Availability	Purpose
1	Location	Allows app to access your location	Both Android and iOS	Customer KYC, Fraud Prevention
2	Contacts	Access to your contacts		UPI and wallet services
3	Photos	Access to photos and videos		UPI payments via QR code
4	Camera	Use of your device camera		UPI payments via QR code
5	Microphone	Access to your microphone		Voice search
6	Notifications	Ability to send notifications		Transactional and promotional communication
7	Files, Media, and Storage	Access to files stored on your device		Supporting customer service requests, KYC, and enabling download of product documents
8	Phone	Make and manage phone calls		SIM binding for app security, UPI registration
9	SMS	Send and view SMS		SIM binding for app security, UPI registration

Note: Access to permission can be managed by the user directly via device settings.

5. Types of information

CFL collects the following types of information:

Information you provide us directly:

- **Identification Details:** Name, contact information, address, date of birth, gender, photo, signature, employment and education details, and government IDs (PAN, Passport, Driver's License, etc.).

- **Financial Details:** Bank Account information, payment details, and income-related data.

- **Biometric Data:** Aadhaar number and biometric details for eKYC, used only for verification and never stored, in line with UIDAI rules.

- **Device Data:** With one-time consent, device model, OS version, device ID, network info, and interaction data.

- **Usage Data:** Access times, IP address, and how you use our services.

- **Limited Device Access:** One-time access to camera, microphone, location, or device for onboarding/KYC purposes only. No access to files, media, contacts, call logs, or similar data.

Information from Other Sources:

We may obtain your information from third parties, such as verification service providers, credit bureaus, and publicly available sources. This may include credit details from credit reporting agencies and information from individuals or organizations with whom you have had, currently have, or may have a financial relationship such as past, present, or future employers subject to applicable laws and, when required, your authorization.

6. Disclosure of Information

We may disclose information provided by you to:

- RBI, SEBI, and other judicial, governmental, regulatory, statutory, or quasi-judicial authorities, as required under applicable laws.
- Credit bureaus for credit rating, reporting, and related purposes.
- KYC Registration Agencies (KRAs).
- Banks, NBFCs, financial institutions, or other business entities in connection with lawful business activities, including reorganizations, mergers, or restructurings.
- Our Auditors, legal advisors, and other professional consultants.
- Limited information may be disclosed to authorize third parties for legitimate and lawful purposes such as verification of information provided by you.
- With your explicit consent, personal information may be disclosed to authorize third parties for providing you with services you've opted.

We may share your information with third parties only under confidentiality agreements that prevent further disclosure unless required for lawful purposes specified in the agreement. Sensitive personal data may be transferred to other entities or individuals only if they maintain the same level of data protection as us, in compliance with applicable IT Rules. Such transfers are permitted when necessary to fulfil a lawful contract or with your explicit consent, and appropriate safeguards will be applied when information leaves our network.

Prior to sharing any personal information, the company will conduct due diligence to ensure third parties have adequate security and privacy measures in place. Privacy risks are also assessed before collecting, using, storing, or disclosing personal information, including during the implementation of new systems or projects.

You may choose to restrict the sharing of specific information through our digital platforms by declining consent. Please note that doing so may limit or affect your seamless access to certain products/services offered by our company.

7. <u>Data Governance and trainings</u>

At CFL, we prioritize transparency and accountability in managing customer data. Data governance is a core focus under our privacy policy, enabling us to deliver high-quality services while ensuring proper management of information. We follow strict guidelines covering data quality, accuracy, minimization, and accessibility, and we use customer information only for specified purposes in accordance with the consent provided.

Our employees handle data ethically and securely, adhering to standards such as proper classification, limiting exposure to third parties, and maintaining confidentiality. Our Company is committed to continuously updating and improving its data governance policies to safeguard the privacy and security of customer information and to maintain trust and transparency in all our operations.

8. <u>Security of Personal Information</u>

CFL is committed to protecting the privacy and security of User's personal information. We undertake following initiatives to secure privacy of the User's Information:

- CFL implements a comprehensive information security program with policies and controls to quickly detect, assess, and resolve security incidents.

- We have a comprehensive process aligned with this standard to ensure that qualifying security.

- Personal information is protected with encryption, masking, access controls, Data Loss Prevention (DLP), and continuous monitoring through Security Operations Centres (SOC).

- Access to data is limited to employees and service providers strictly on a need-to-know basis, with systems regularly updated with security patches.

- All third-party vendors follow the same data protection standards, and any unauthorized use or breach may result in penalties or legal action.

- CFL has an IT infrastructure support mechanism through its Technology Service Provider, which facilitates periodic system maintenance and application of relevant security updates.

However, the Company shall not be liable for any loss, unauthorized access, or harm resulting from the misuse of personal information by the information provider or any third party, except in cases where such loss or harm directly and foreseeably arises from the Company's negligence or failure to comply with applicable obligations. The information provider acknowledges that the Company is not responsible for actions by external parties or by the information provider that may cause loss, damage, or harm to themselves or others.

9. Cookies

Company's websites may use "cookies" (information stored on an individual's computer by an individual's browser at our request). Cookies are small data files stored on your computer or electronic device by a website. While cookies contain unique identifiers, they do not store personal information such as your name or account number. CFL may:

- Temporarily store the mobile number submitted during a session in a cookie, which is automatically deleted upon session termination.

- Utilize persistent cookies, retained on the user's device, to capture non-personal information such as browser type, ISP, operating system, clickstream data, and demographic profiling including age, gender, or income.
- Leverage information stored in cookies to enhance the user experience by delivering relevant content where applicable.

Maintain other necessary information in cookies to optimize the functionality and usability of our services.

10. <u>Data Storage and Retention of Information</u>

CFL shall retain/store User's Information through its Technology Service Provider, 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. CFL may retain the following kinds of information including but not limited to the following:

Sr. No	Kinds of Information	Retention period
1	KYC Documents (Identity and Address proof, and Account Opening Form)	During the tenure of relationship and at least Five years after cessation of the relationship
2	Loan Files containing documents like Application Form, Income Documents, agreements etc., collected at the time of opening account and thereafter in respect of Closed Account	During the tenure of relationship and 5 years from closure of Loan
3	Loan Files containing documents like Application Form, Income Documents, agreements etc., collected at the time of opening account and thereafter in respect of Closed Account (for B2B Loans availed through our dealer/partners)	During the tenure of relationship and 5 years from closure of Loan

4	Customer Walk-in Complaint/ Suggestion Register	5 years
5	All necessary records of transactions between the CFL and the User	5 Years from the date of transaction
6	Deceased Constituents A/c. (Death Certificates, Affidavits, Letters of Disclaimer, Succession Certificate copies, and other related correspondence)	5 Years

Information may be retained for a longer 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 CFL.

Further, CFL has in place a robust incident management system along with a proactive incident response posture. If retaining Customer Information is no longer necessary, we make every effort to securely destroy or delete it as per applicable regulations.

11. What are your Rights and how you can exercise them?

By accepting this Privacy Policy, you provide consent to the Company to share, receive, record, store, and process your Personal Information and Sensitive Personal Information as described in this document. While using our services or otherwise, you have the following rights:

- **Right to Withdraw Consent / Data Erasure:** You may withdraw any consent previously given to us or request the deletion of your data. These rights can be exercised by writing to us at our corporate address: 301, 3rd Floor, A Wing, Hetal Arch S.V. Road, Malad West, Mumbai - 400064, or via email at care@comfortfincap.com

  Additionally, all optional consents provided through our Digital Lending Application (DLA) can be withdrawn directly through the DLA itself.

If you withdraw consent or request deletion of personal information, we will review the request and take appropriate action. If personal information is not provided or consent is withdrawn, we may choose not to provide certain services for which the information was required. In such cases, some data may still be retained to comply with applicable laws. These rights are in accordance with RBI's Digital Lending Directions and may not apply to every consent provided while using our services.

- **Right to Correction of Information:** We have defined processes in place to allow you to review and update the personal information or sensitive personal data you have provided. Any inaccurate or incomplete information will be corrected or amended as feasible. We verify data through submitted documents in accordance with our 'AML / KYC Policy' and 'Know Your Customer Documentation Checklist,' available on our website under 'Company Policies.'

  You are responsible for keeping your personal information up to date and notifying us promptly of any changes. To review, correct, or update your information, you can write to care@comfortfincap.com or contact us at our corporate address: 301, 3rd Floor, A Wing, Hetal Arch S.V. Road, Malad West, Mumbai - 400064.

- **Right to Grievance Redressal:** The Company has a structured grievance redressal mechanism to ensure all complaints are addressed within a defined time frame.

  You may submit grievances via email at GRO@comfortfincap.com or at our corporate address listed above. Complete details of our grievance redressal policy, including Nodal Officer information, are available on our website under in the 'RBI - Integrated Ombudsman Scheme, 2021' section under 'Company Policies.'

12. Governing Law and Dispute Resolution

This Policy shall be governed by and construed in accordance with the laws of India. The courts at Mumbai, India shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.

13. No Waiver

The rights and remedies available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. It may be waived only in writing. Delay in exercising or non- exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.

14. Disclaimer

The Company does not collect personal information unless you use our website or services. We may also receive information from third-party services if you are already connected with them. We implement reasonable security measures managerial, operational, technical, and physical to protect and safeguard your personal data, which is of utmost importance to us.

We are committed to protecting the personal and financial information you provide. Your personal information will not be sold or shared with unaffiliated third parties. Any information you share with us will be used only for the purposes you consent to and will remain confidential.

Information provided by you as a registered user helps us serve you better and will not be shared without your consent. However, we may disclose personal data to our agents, contractors, or affiliates on a need-to-know basis to process transactions, communicate with you, or provide services. This information may also be used for market analysis, product and service improvements, and understanding user behaviour, provided that such parties maintain confidentiality and use the data solely for the purposes of performing services for us.

15. <u>Website & links to Other Sites</u>

The Company's website may include links to third-party sites. If you choose to access these links, you will be redirected to external websites that are not operated or controlled by us. We strongly encourage you to review the privacy policies and terms of such external platforms. CFL does not have authority over, and assumes no responsibility for, the content, privacy practices, or operations of any third-party websites or services.

16. <u>Amendment of Privacy Policy</u>

The Company may modify or update this Privacy Policy periodically to comply with legal requirements or to reflect changes in our practices. We recommend that you review this page regularly, as any updates will become effective immediately upon being posted.

Contact Us: In case you have any questions, concerns, or requests related to this Privacy Policy or your personal information, you may contact us through the contact options displayed on our website: www.comfortfincap.com/contact-us.

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