

PRIVACY POLICY

Your privacy is of utmost importance to us and protection of your Personal Data as disclosed by you to us is a key commitment for us. During your usage of our platform, we may collect and generate various data points about you as elaborated below. In this, we are governed by the provisions of applicable law in India including the Information Technology Act 2000 and the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 to maintain the privacy of your Personal Data. We collect and process your Personal Data only to the extent necessary for us to process your requirement(s) and in the manner as detailed hereinafter below in section II and III, and in accordance with such applicable law. In case you choose not to share your Personal Data as required, with us, we may not be able to carry out your transaction.

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"Personal Data" means data relating to you and any of your employees, agents and representatives, that is directly or indirectly identifiable, having regard to any characteristic, trait, attribute or any other feature of your identity or any combination of such features with any other information. Personal Data does not mean information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force. Personal Data includes Sensitive Personal Data, which relates to password, financial information such as bank account or credit card or debit card or other payment instrument details, physical, physiological and mental health condition, sexual orientation, medical records and history, biometrics or any other data categorised as sensitive under applicable law in India.

I. Types of Information we collect

We may collect following information from you, as you may have disclosed to us:

1. Personal Details such as PAN Card/ Identity Card / Passport details / Aadhaar details / Voter ID / Driving License/Mobile Number of Directors/Proprietor/Partner/Collection Agency (Company)/Collection Agent
2. Head Office/Branch Address Proof of the Collection Agency
3. Debt Recovery Agent ("DRA") Certificates (wherever applicable) of employees that will work on cases
4. Cancelled Cheque of the Collection Agency
5. Bank Statement of the Collection Agency
6. GST Certificate of the Collection Agency
7. Shop & Establishment Certificate of the Collection Agency
8. Indemnity Insurance of the Collection Agency \ **including but not limited to fidelity insurance of your field agents and employees**
9. **Name details and contact number of Telecallers** to be provided by the Collection Agency
10. Name and details of Field Staff /Number of field-staff to be provided by the Collection Agency
11. Product, Bucket and Cities in which collections services to be provided by the Collection Agency
12. Collection Agency's phone number & email ID
13. Collection Agent's photograph (applicable in case of field agent)
14. information obtained from your mobile device by way of using our app like device location/geolocation, , device information (including storage, model)

15. Voice recordings of the conversations between the Collection Agency / Agents/representatives and the Customers as audit, regulatory and quality compliance and statutory requirements."

16. voice recordings of our conversations with our customer care agent with you to address your queries/grievances

17. access to your mobile camera device for the functioning of many in- app functionalities including uploading images or videos that borrower is willing to share that will benefit the collections purposes but not limited to scan and pay etc. access to device camera is required. Permission is sought for the same at appropriate stage during the app usage.

18. access to files from your mobile device such as audio, video files for the functioning of many in-app functionalities including but not limited to in-app chat, access to user's contacts, files, images, audios and videos is required. Permission is sought for the same at appropriate stage during the app usage.

19. for the functioning of many in-app functionalities including, but not limited to device binding for user authentication, access to user's SMS is required, permission is sought for the same at appropriate stage during app usage.

II. Sharing and Storage of your Personal Data

Any Personal Data that we have access to shall never be shared without your consent. In various processes / / availment of product / service offerings, we even seek your explicit consent to use / share your Personal Data.

In our business and operational processes, we only share the data on a partial and "need-to-know" basis to designated personnel or partners or service providers.

We may process, store and retain your Personal Data on our servers where the data centers are located, and/or on the servers of third parties having contractual relationships with us. All Sensitive Personal Data is stored in India. We will retain your data for the period that you continue to be our Platform/App User and for such period as required to comply with any obligation under any law for the time being in force.

We will share your data with competent / legal / statutory / regulatory agencies / authorities / auditors or partners / service providers acting on our behalf (as the case may be) in following cases:

- For enabling the provision of the ~~products~~—services availed by you, strictly on a "need to know" basis and subject to applicable laws.
- Where it is directed or required by legal / regulatory / statutory / governmental authorities / judiciary under any applicable laws / regulations or judicial pronouncement through a legally obligated request.
- Where it is required by financial institutions to verify, mitigate or prevent fraud or to manage risk or recover funds in accordance with applicable laws / regulations.

III. Usage of Your Personal Data

We use your Personal Data in our business activities for providing our – products/ services and to perform, among other actions, the following:

1. To facilitate the collections related activities or report on these activities ;
2. To undertake research and analytics for offering or improving our products / services and their security and service quality;
3. To check and process your requirements submitted to us for products / services and / or instructions or requests received from you in respect of these products / services;
4. To share with you, updates on changes to products / services and their terms and conditions including platform's terms and conditions;
5. To take up or investigate any complaints / claims / disputes;
6. To respond to your queries or feedback submitted by you;
7. To verify your identity for us to provide products / services to you;
8. To carry, screenings or due diligence checks as lawfully required by us;

9. To monitor and review products & services from time to time;
10. To undertake financial / regulatory / management reporting, and create and maintain various risk management models;
11. To conduct audits and for record keeping purposes;
12. To comply with the requirements of applicable laws / regulations and / or court orders / regulatory directives received by us;
13. For the purpose of monitoring and managing all digital, calling & field activities within the Creditmate Platform we may keep a track of the following information at a Collection Agency or individual agent-level:
 - Total Calls made
 - Total Successful calls made
 - Total borrowers contacted
 - Contactability ratio/Answer rates
 - Total digital communication sent
 - Click rates on digital campaigns
 - Total Field visits
 - SMS campaigns
 - Call recordings
 - Dispositions
 - Location tracker & cash pickup tracker for field agents
 - Total Payments received
 - a. Via Digital
 - b. Via Tele-calling
 - c. Via field

IV. Inactivation of your account

You may choose to make your account inactive/deactivate you account at any point of time by raising a support ticket on the following email id: "hello@creditmate.in" and our Operations department/team shall accordingly act upon the same. With this we will no longer provide your data for external processing as mentioned above. However, we retain your Personal Data as long as the purpose for its usage exists, after which the same is disposed off by us except for any record retention required as per applicable law. The provisions of various laws require your transaction logs to be stored for longer periods post the deletion of an account. Further, in the event of the pendency of any legal / regulatory proceeding or receipt of any legal and / or regulatory direction to that effect, we may be required by the law of the land to retain your Personal Data for longer periods.

V. Cookie Policy - We do not use cookie in the mobile app.

VI. Links to other websites - Does not apply to our app

Our website may contain links to other websites which are not maintained by us. This privacy policy only applies to us. You are requested to read the other websites' privacy policies when visiting these websites.

VII. Reasonable Security Practices and Procedures

We take various steps and measures to protect the security of your Personal Data from misuse, loss, unauthorised access, modification or disclosure. We use latest secure server layers encryption and access control on our systems. Our safety and security processes are audited by a third party cyber security audit agency from time to time.

We have provided multiple levels of security to safeguard your app by Login / Logout option, , that can be enabled by you. We also ensure the device binding so that the same login cannot be used on different device without any additional authentication / OTP. It is secured by an OTP login. Please do not share your Account's login, password and OTP details with anybody.

While we observe reasonable security measures to protect your Personal Information on all our digital platforms, security risks may still arise for reasons outside of our control such as hacking, virus dissemination, force majeure events, breach of firewall etc. Please note that the above mentioned measures do not guarantee absolute protection to the Personal Information.

VIII. Contact us

You may contact us on any aspect of this policy or for any discrepancies / grievances with respect to your Personal Data, by writing to our Grievance Officer as per the details provided below:

Name: Designation: Email ID:

privacy.grievanceofficer@paytm.com
Urja Money Private Limited

IX. Policy Review & Updates

This policy will be reviewed by us as and when required and the same may be subject to change at any point in time. The latest & most updated policy can always be found at <https://collect.creditmate.in/>

While we will make reasonable efforts to keep you posted on any updates to this privacy policy, to make sure that you are aware of any changes, we recommend that you review this policy periodically.

This Privacy Policy shall apply uniformly to Urja Money Private Limited and its brand offering “Creditmate” , mobile WAP site i.e. “CM Collect” & mobile applications.

Urja Money Private Limited reserves the right to modify/update this Privacy Policy. We will post the changes to our Privacy Policy, if any, on this page. Please check the “Last updated” legend at the bottom of this page to see when this Privacy Policy was last updated. We encourage you to check the same to be informed of how Urja Money Private Limited is committed in protecting your information and providing you with the improved content.

In this policy, the words “we”, “ours” and/or “us” refer to Urja Money Private Limited (“Urja Money”) and “you” and/or “your” refer to Collection Agencies/Agents.

X) Governing Law & Jurisdiction

This policy will be governed by and construed in accordance with the laws of India and subjected to the exclusive jurisdiction of Courts of New Delhi.