PRIVACY POLICY

Prepared by Legal & Compliance Team
SAMPATI SECURITIES LIMITED
2nd Floor, Mrudal Tower, B/h Times of India, Ashram Road, Ahmedabad, Gujarat, India, 380 009

Privacy Policy

This Privacy Policy ("Policy") describes how **Sampati Securities Limited** ("Sampati", "Company", "we", "our", "us"), a Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India ("RBI") vide registration number – 01.00214, and its third party service provider, **Digital Lending App & Lending Service Provider (LSP), Credify Technologies Private Limited** ("Credify", Creditt+), collect, use, store, share, and protect your personal information when you avail of our loan and related financial services ("Services").

By accessing or using the **Creditt+, Digital Lending App** or otherwise availing Services facilitated by Sampati, you consent to the practices described in this Policy.

This Policy is issued in compliance with the **Information Technology Act, 2000**, the **Digital Personal Data Protection Act, 2023**, and applicable RBI guidelines including the **Fair Practices Code, KYC Master Directions**, and the **Guidelines on Digital Lending, 2022 and as amended from time to time.**

1. Applicability & Roles

1. **Sampati Securities Limited (NBFC):** The regulated entity providing loan services and responsible for compliance with RBI guidelines, including safeguarding of customer data and grievance redressal.
2. **Credify Technologies Private Limited (DLA/LSP):** Provides the digital lending platform through which customers apply for and manage their loans. Credify acts as a service provider and collects/ processes customer data **solely on behalf of Sampati.**

All data collected by Credify is deemed to be collected **for and on behalf of Sampati Securities Limited,** and Sampati remains ultimately responsible for such data.

2. Information We Collect

We may collect the following categories of information directly from you through the Creditt+ App, or from third parties as permitted by law:

a) Identity & KYC Information

- Name, photograph, date of birth, gender, address, contact details.
- PAN, Aadhaar (with OTP-based consent validation), Passport, Voter ID, Driving License or any other Officially Valid Document (OVD).

b) Financial Information

- Bank account details, IFSC, statements.
- Salary slips, GST returns, income details, ITRs.

c) Loan & Transaction Data

- Loan applications, disbursements, repayments, outstanding dues.
- Repayment history and defaults.

d) **Device & Technical Data (via Creditt+ App, only with consent)**

- Mobile/device identifiers, IP address, operating system.
- Geolocation (if enabled by you).
- Usage and interaction data on the app.

e) **Communication & Other Data**

- Call recordings with customer care.
- Feedback, complaints, survey responses.

3. Purpose of Collection & Use

Your data may be used for the following purposes:

i. To comply with KYC/AML and RBI regulations.
ii. To assess creditworthiness, loan eligibility, underwriting, and repayment capacity.
iii. To process loan applications, disbursements, repayments, and collections.
iv. To comply with mandatory reporting to regulators and credit information companies (CICs).
v. To provide customer support and resolve grievances.
vi. To detect and prevent fraud, money laundering, or misuse.
vii. For service enhancement, research, and innovation (in anonymized/aggregated form).
viii. For marketing and promotional communication (only with your explicit consent).

4. Data Sharing & Disclosure

Your personal data is not sold at any point of time. However, it may be shared in the following circumstances:

- **With regulators/statutory authorities** (e.g., RBI, FIU-IND, law enforcement) as required under law.
- **With Credit Information Companies (CICs)** for credit reporting.
- **With third-party service providers engaged by Sampati/Credify**, including KYC verification agencies, payment gateways, IT service providers, and collection agencies. Such third parties operate under strict confidentiality agreements.
- **With group companies/affiliates** of Sampati (only as permitted under law).
- **In case of legal proceedings or investigations**, if disclosure is required by law.

5. Data Ownership & Responsibility

- All data collected through the platform of Creditt+ (DLA) is deemed to be collected **on behalf of Sampati Securities Limited**.
- Sampati is the **owner and ultimate custodian of customer data**.

- Credify, as an LSP, acts only as a technology and service provider with no independent rights over the data.

6. Data Security

We employ robust technical and organizational security measures including:

- Data encryption (in transit and at rest).
- Secure cloud storage located in India for data storage.
- Firewalls, intrusion detection, and vulnerability assessments.
- Restricted access based on role and need-to-know principle.
- Regular audits and compliance checks.

In case of a **data breach**, Sampati will notify affected customers and relevant authorities in accordance with applicable laws.

7. Data Retention

- The Company follows statutory data retention requirements as mandated by RBI, Companies Act, Income Tax Act, and the Digital Personal Data Protection Act. The retention timelines are as follows:

Type of Data	Retention Period	Legal Basis
KYC records (ID, proof, CKYCR data)	5 years after loan closure	RBI Master Direction – Know Your Customer (KYC) Direction, 2016 (updated till 2023)
Loan files (agreements, sanction letters, repayment history)	8 years from end of financial year	Companies Act, 2013; Income-tax Act, 1961
Digital device/app data (geolocation, SMS, contacts, device info)	Only till purpose served; deleted post-assessment	RBI Guidelines on Digital Lending, 2022 as amended from time to time
Credit bureau reporting records	8 years	Credit Information Companies (Regulation) Act, 2005; Companies Act, 2013
Grievance/complaint records	5 years after resolution	RBI – Integrated Ombudsman Scheme, 2021
Tax-related loan records	8 years	Income-tax Act, 1961

After the expiry of the applicable retention period, personal data will be securely deleted or anonymized, unless retention is required for ongoing investigations, disputes, or regulatory proceedings.

8. Your Rights

As a customer, you have the following rights:

- **Right to Access & Rectification** – request details of your personal data and corrections.
- **Right to Withdraw Consent** – withdraw consent for optional data usage (e.g., marketing, geolocation). Withdrawal of mandatory consent may impact loan services.
- **Right to Deletion/Erasure** – request deletion of data subject to legal and contractual obligations.
- **Right to Opt-out of Marketing** – decline promotional messages while continuing to receive essential loan-related communication.

9. Minors

Loan services are not offered to individuals below the age of 18. We do not knowingly collect data from minors.

10. Updates to Policy

This Policy may be updated periodically. The latest version will be published on the **Creditt+ App/Website** and will be binding once you continue to use our services.

11. Communication

By using the Creditt+ App or our services, you consent to receive communications (calls, SMS, emails, WhatsApp) regarding your loan account, repayment reminders, regulatory updates, or grievance handling. Marketing communication will only be sent with your prior consent.

12. Grievance Redressal

As per RBI guidelines, Sampati Securities Limited remains responsible for grievance redressal. Customers may raise complaints as follows:

Grievance Redressal Officer
Sampati Securities Limited
2nd Floor, Mrudul Tower, B/H Times of India, Ashram Road,
Ahmedabad, Gujarat, India, 380009
Email: finance@sampati.co.in
Phone: +91 9974530000

You may also escalate unresolved complaints to the **RBI Ombudsman** in accordance with the **RBI – Integrated Ombudsman Scheme, 2021**.

13. Updates to this Notice: We may occasionally update this, Policy. Use of our Services after an update constitutes consent to the updated notice to the extent permitted by law. Please take the time to periodically review this Policy for the latest information on our privacy practices.

SAMPATI SECURITIES LIMITED