

Privacy Policy

1. INTRODUCTION

SONU MARKETING PVT LTD , a Company ("Company, "we" or "us") incorporated under the Companies Act, 1956, having registered office at 71 Metcalfe Street 3rd Floor Room No- 302 Kolkata West Bengal India – 700013, is committed to protecting the privacy and security of your personal information. For the purposes of this Privacy Policy ("Policy"), "you" and "your" shall mean you as a User of the App/website ("User"). This Policy describes how we collect, store, use, disclose, transfer and process your information for providing you the Services through the Company's mobile application and (or) website ("Platform"). The services offered through the Platform are collectively referred to as "Services."

You are advised to read the Policy carefully and accept the terms of this Policy before using the Services offered by us. By accessing and using our Platform directly or indirectly, you signify that you have read, understood and agree to be bound by this Policy.

This Policy shall be enforceable against you in the same manner as any other written agreement. Terms & Conditions and all capitalized terms under this Policy that have not been specifically defined herein shall have the meaning as ascribed to it under the Platform terms & conditions.

SONU MARKETING PVT LTD, a Company within the meaning of Companies Act, 2013, having registered office at 71 Metcalfe Street 3rd Floor Room No- 302 Kolkata West Bengal India – 700013 (hereinafter shall be referred to as "Company" or "us" "creditlab" or "we"). For the purposes of this Privacy Policy ("Privacy Policy") "you" and "your" shall mean you as a User of the App/website ("User").

SONU MARKETING PVT LTD recognizes the importance of maintaining your privacy and is committed to protecting the privacy and security of your personal information. We value your privacy and appreciate your trust in us. This Policy describes how we collect, store, use, disclose, transfer and process your information for providing you the Services through the Company's mobile application and (or) website ("Platform"). You are advised to read the Privacy Policy carefully and accept the terms of this Privacy Policy before using the services offered by us. By accessing and using our Platform directly or indirectly, you signify that you have read, understood and agree to be bound by this Privacy Policy.

This policy shall be enforceable against you in the same manner as any other written agreement. Terms & Conditions and all capitalized terms under this policy that have not been specifically defined herein shall have the meaning as ascribed to it under the platform terms & conditions.

2. INFORMATION AND PERSONAL DATA WE COLLECT

We may collect, store, use, disclose, transfer and process your information and personal data, with your consent, as below:

SI No.	Data Collected	Purpose
1	Personal Information: This may include but is not limited to full name, permanent and current address, email address, phone number, Permanent Account Number (PAN), Aadhaar card number, passport details, Voter ID card, date of birth, photograph.	To provide Services to you; verify your eligibility, facilitate communication, prevent fraud, and comply with legal requirements.
2	Financial Information: Salary and Income details, employment status and details, credit history, bank account number and bank account data including E-Mandate/E-NACH, NEFT, IMPS and UPI ID details, bank statement, information and other required details.	To provide Services to you; verify your eligibility, prevent fraud, enable communication, and to comply with legal requirements
3	Demographic information: Age, gender, nationality, religion and others.	To verify your eligibility, prevent fraud, enable communication, for marketing, to comply with legal requirements
4	Device Information: Following registration, when you use the Services, we may gather data about your device, such as its	For marketing purposes, ensuring account security, fraud prevention, and analyzing the stability of the Services.

SI No.	Data Collected	Purpose
	name, model, region and language settings, unique device identifier, hardware and software details, status, and usage patterns.(as applicable)	
5	App Data: We gather information about the installed apps on your device while you use our Services, such as the name of the application, the size of the application, and the time it takes to install or update. (as applicable)	For credit risk analysis, fraud detection, application verification, and ensuring the absence of malicious and untrusted applications.
6	Usage data: We collect data on your interactions with our application. This includes data such as Service access times, app crash logs,etc.(as applicable)	To provide customer support, improve the user experience, and conduct fraud risk analysis.
7	Storage: We need your explicit permission to access the storage on your device. .(as applicable)	For Loan process, credit review, and KYC process.
8	Camera: Pursuant to your consent.	For KYC process, Loan Process, user complaints and feedbacks.
10	Marketing and Communication records: Any communication with customer service including emails, call recordings, chat logs, information about promotions,	For marketing purposes.
SI No.	Data Collected	Purpose

	surveys, campaigns, subscription or withdrawal from getting any marketing materials. .(as applicable)	
11	Cookies: Cookies and tracking technologies are used to enhance your experience and improve our Services. In some cases, cookies may be collected without explicit User consent if they are used solely for technical or statistical purposes, not for personalization of advertising or tracking User behavior for marketing. .(as applicable)	These may include session cookies, which are temporarily stored in the user's browser to ensure the proper functioning of the website until the session ends. These cookies may store session state information such as User authorization; technical cookies (used to ensure the operation of the site and to perform technical functions, such as saving User preferences); analytical cookies (used to collect depersonalized statistical information about how Users interact with the Website, such as the number of visitors, time spent on pages, etc. This helps Website owners understand how to improve User experience).
12	Contacts Information: We require reference contacts when using the services in order for us to check your credit and assist you with the loan application process. .(as applicable)	Loan eligibility, credible reference, risk analysis.

3. USE OF PERSONAL DATA AND PURPOSES

We require and use your personal data in compliance with applicable laws for the following reasons, notwithstanding the points mentioned above:

- i. For loan assessment and decision-making: We need to assess eligibility for the loan through the personal data provided by you. We use factors such as income, employment status, creditworthiness, etc. to determine whether to approve or deny the loan application.
- ii. For verifying, validation and authentication: The personal data provided is verified and validated to ensure its accuracy and authenticity and for doing KYC evaluation and risk assessments. The data may be cross-checked with relevant authorities, verifying supporting documents to confirm the individual's identity and other relevant details.

- iii. Internal risk management: Personal data collected from you is used to evaluate the level of risk associated with lending of loans. This is necessary to improve our Services, reduce fraud rates, build risk models, etc.
- iv. For processing loan and transactions: We process the personal data collected from you to facilitate the processing and disbursement of approved loans. This will include activities such as creation of loan agreements, maintaining records of loan, availing of credit facilities including initiating fund transfers, making repayments, recovery, etc.
- v. For providing Services and customer support: We use your information to communicate loan application status, provide updates, and address any queries or concerns. The information also enables our lenders to provide customer support throughout the loan application process. We also use your Personal Information to market our products and services and to notify you about events, offers, sponsorships, marketing programmes and similar marketing campaigns.
- vi. For marketing our products and services: We use your information to market our products and services and also to notify you about events, offers, sponsorships, marketing programmes and similar marketing campaigns. We may also process and analyse your information (including Sensitive Personal Information) to understand your usage trends and preferences, and to develop and market new products, services, features and functions to you based on the analysis conducted.
- vii. For conducting research to improve our product and services: The information is to research and gain insights into the latest market trends so that we can improve and develop technologies to support our products and services..
- viii. Compliance with legal and regulatory requirements: The Personal data is processed to fulfill legal and regulatory obligations imposed on us, including but not limited to anti-money laundering (AML) and know your customer (KYC) requirements. This may involve sharing information with regulatory authorities or conducting necessary reporting.

4. HOW WE COLLECT DATA

We employ various methods to collect and process data, including;

- i. Information you provide: Data you consent to provide when using our Services or correspond with us;
- ii. Information we collect automatically: Data collected automatically each time you visit our Platform or use our Services;
- iii. Information from Third- Parties: Personal data received from third parties and publicly available sources, including analytics for advertising and user analytics purposes.

5. SHARING OF PERSONAL INFORMATION

We believe that your personal information should be treated with utmost confidence, and we take all reasonable measures to ensure that your personal information is disclosed and shared with third parties through secure methods. By accepting this Policy, you explicitly provide your consent to sharing your Information (including Sensitive Personal Information) with third parties, affiliates, and service providers in connection with services and products offered to you. We may share your personal information with following parties:

i) Credit Bureaus: We share your Personal Information with credit bureaus to obtain credit reports and assess your creditworthiness. Including credit history, outstanding debts, payment behaviour, and credit scores.

ii) Verification Agencies: Personal data may be shared with third-party verification agencies or service providers to validate the accuracy and authenticity of the information provided in the loan application by you such as employment details, income, identity, or other relevant data.

iii) Lending Service Providers (including Recovery agents) and Third Party Service Providers: We may share personal information with our service providers and vendors to enable service delivery (including recovery of loans) through our partners and technical support teams.

iv) Regulatory and Legal Compliance: Personal Information may be shared with regulatory authorities, government agencies, or law enforcement entities to ensure compliance with applicable laws, government requests, and legal and regulatory obligations.

We do not rent, sell or share Your information and will not disclose to third parties or affiliates, unless:

- i. it is in connection with disclosure to financial institutions and banks, in which case, the User hereby gives his express permission;
- ii. it is in connection with the Services being rendered through the Platform;
- iii. it is to help investigate, prevent or take action regarding unlawful and illegal activities; suspected fraud, potential threat to the safety or security of any person, violations of our Terms of Use, or as defence against legal claims;
- iv. it is a case of special circumstances such as compliance with court orders, requests/order, notices from legal authorities or law enforcement agencies compel us to make such disclosure;
- v. it forms part of the information we share with marketers and advertisers;
- vi. it improves personalization, analysis and for offering new products/services.

Please note that in the event you are directed to a third-party website and if you choose to access them (or avail of such third party's offerings), we will not be responsible for privacy practices or content of such third-party websites or applications.

6. DATA RETENTION

We retain your personal data only as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, compliance, accounting, or reporting requirements. We shall retain your data till the required period to comply with legal and compliance obligations.

Further, you may exercise the following rights by sending us a mail over support@creditlab.in.

Sl No.	Rights provided to You	Details
1	Right to rectification	In the event that any personal data provided by you is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data.
2	Right to withdraw consent	You have the right to withdraw specific consents you have provided under this Policy. However, if you do so, you may not be able to access some of the features or Services.
3	Right to restrict disclosure to third parties	You have the right to request a restriction on the disclosure of your information to third parties. However, please note that such a restriction may prevent you from using our Services.
4	Right to revoke consent	This allows you to withdraw consent previously granted for the collection of personal data. We will comply with such requests, subject to applicable laws and the terms of any loans sanctioned through the Platform. However, exercising this right may limit or hinder our ability to provide services to you.
5	Right to request deletion	You may request deletion of any data collected by us pursuant to this Privacy Policy by reaching out to us. However, this right is subject to any lawful requirements and exercising this right may limit or hinder our ability to provide services to you.

Post termination of your relationship with SONU MARKETING PVT LTD, we may continue to use your anonymized data either individually or in combination with anonymized data of other users. We use this aggregated anonymized data for data analysis, profiling, and research purposes. This helps us gain insights into our user behaviour and their profiles and improve our Services. We

may keep

your contact information along with your application details (if any) to prevent fraud for the exercise/ defense of a legal claim or for providing evidence in legal proceeding(s) as required.

7. SECURITY BREACH

We at SONU MARKETING PVT LTD, are committed to providing you the utmost security and safeguarding of your personal data. We implement sufficient and reasonable security measures to protect your personal information from unauthorized access, use and disclosure. While we take every reasonable measure to protect your personal information, it is important for you to understand that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security. This includes maintaining the confidentiality of your Account credentials, promptly reporting any suspicious activities, and adhering to the terms and conditions outlined in our Privacy Policy.

- i. Your personal data can be accessed after you login to your Account through the Website/App. You are requested not to share your password and login ID with anyone as it can lead to data leakage. You can update the data such as your postal address, contact details, employment information from the Website/App.
- ii. Your information is stored on our servers, and we encrypt certain sensitive information using Secure Socket Layer (SSL) technology to ensure that your personal details are safe as it is transmitted to us.
- iii. We have restricted access to our database to a single IP address; external networks are unable to access it. In addition, the database provides quick data recovery in the event of data loss and includes several backup strategies. We defend against DDOS attacks on specific traffic by utilizing the fundamental DDOS protection capability offered by cloud vendors.
- iv. The processing of data including the collection, usage, and sharing of your personal information by SONU MARKETING PVT LTD shall be in compliance with the applicable laws.
- v. In the event of a security breach which is raised to us or comes to our knowledge, we will comply with all applicable laws and regulations and take steps to make sure there is no further misuse of such information and may attempt to notify you electronically so that you can take appropriate steps.

8. REVIEW AND UPDATE

We regularly review this Policy and reserve the right to change or update this Policy at any time. Such changes shall be effective immediately upon posting on this Platform. Your access and use of the Platform following any such change constitutes your agreement to follow and be bound by

this Policy, as updated or modified. For this reason, we encourage you to review this Policy each time you access and use the Platform.

9. DISPUTE RESOLUTION

In the event of any dispute, difference or claim arising out of this Policy, the same shall be settled in accordance with the laws of India through regular judicial process and the courts of Kolkata/Bangalore shall have exclusive jurisdiction.

10. GREIVANCE

If you have any questions about this Privacy Policy or concerns regarding your privacy, please feel free to contact us at support@creditlab.in.