

**KOGTA FINANCIAL (INDIA) LIMITED**

**PRIVACY POLICY FOR WEBSITE USE**

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## 1. Introduction

Kogta Financial (India) Limited ('the Company') is a Non-Banking Financial Company ('NBFC') having valid Certificate of Registration with Reserve Bank of India ('RBI') vide registration no. B.10.00086 dated May 27, 2016 under current RBI classification as NBFC - Investment and Credit Company (NBFC-ICC) – Non Deposit taking Systemically Important ('ICC-ND-SI') with more than 20 years of experience in asset finance business.

It is focused on offering financing of all kind of commercial vehicles (HCV, LCV, MUV, SCV), Cars, Tractors, Two-wheelers and MSME & Loan against property segment

## 2. Preamble

This document is published by virtue of a legal requirement under the provisions of the Information Technology Act, 2000 that require intermediaries to publish the rules and regulations, privacy policy and terms for access or usage of its Website and is primarily governed by Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

At **Kogta Financial (India) Limited** (hereinafter referred to as "**the Company**"), privacy issues are of high priority. We are committed to protect your privacy. The Privacy Policy for website use tells you how the Company will collect, use, disclose, transfer, and store your information collected on the Platform. Please read the Policy carefully before submitting information on our website [www.kogta.in](http://www.kogta.in) and/or mobile app (hereinafter referred to as the "**Platform**"). By accessing or using the Platform, you are accepting the practices described in this Policy and acknowledge that you have read, understand, and agree to be bound to all the terms of this Policy and our Platform Terms of Use. If you do not agree to these terms, exit this page and do not access or use the Platform.

This policy may be changed at any time upon the sole discretion of the Company and without prior notice to you. The revised Policy will be effective immediately when posted/published on the Platform. It is your responsibility to review the Platform and the Privacy Policy periodically to learn of any revisions to this Policy. Your continued use of the Platform after the effectiveness of such revisions will constitute your acknowledgment and acceptance of the terms of the revised Policy.

This Policy set forth are for this Platform and all related sub-domains, Company's mobile applications (if any) and related services accessible via smart phone and/or any other communication tool or electronic device. If you visit any other app/site referred on this Platform, the same shall be governed by the privacy policy of such sites.

## 3. What Information do we Collect?

We may collect and process the following data about you:

- (i) Information you give us about you (Submitted information):
  - a. provided by filling in forms in the Platform;
  - b. provided by corresponding with us (for example, by e-mail or chat);
  - c. including information, you provide when you register to use the Platform, subscribe to any of our services (such as applying for a loan from the Company), search for a service, share data via the Platform, enter a competition (if any), promotion or survey, and when you report a problem with the Platform, our services, or any of our sites and/or mobile application;
- (ii) Information we collect about you and your device. Each time you visit one of our sites or use one of our Apps we may collect the following information:
  - a. technical information, including the type of mobile device you use, unique device identifiers (for example, your device's IMEI or serial number), information about the SIM card used by the device, mobile network information, your device operating system, the type of browser you use, IP address or your device's location and time zone setting (Device Information);
  - b. information stored on your device (Content Information);
  - c. details of your use of any of our mobile applications or your visits to any of our sites including, but

- not limited to, traffic data, location data, weblogs and other communication data (Log Information);
- d. Location information: We may also use GPS technology or other location services to determine your current location;
- (iii) Information we receive from other sources (Third Party Information). We reserve the right to work with a limited number of third parties (including credit reference agencies, mobile network providers, and collection agencies, etc.) and may receive information about you from them.

#### **4. Collection of Personal Information**

We will only use the information we collect about you lawfully and in accordance with the Information Technology Act, 2000, the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 and other applicable laws of India. We may collect your personally identifiable information such as name, postal address, e-mail address and phone number, the device's phone number, SIM card, age, username, password and other registration information, financial and credit information, personal description, photograph names, credit or debit card information and other payment instrument details etc. which you voluntarily provide to us for facilitating the services provided by the Company. Depending on the activity, some of the information we ask you to provide is identified as mandatory and some is identified as voluntary. If you do not provide the mandatory information for a particular activity, you will not be permitted to engage in that activity. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we may not be able to provide you with our services or respond to any queries you may have. The Company and/or its affiliates may share this personal information with each other and use it consistent with this Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising.

We use personally identifiable information to provide services to you, enhance the operation of the Platform, improve our marketing and promotional efforts, analyze Platform use, improve our service offerings. For example, if you send our customer service an email we may use your comments and feedback to tell others about our services, and may post your comment in our marketing materials or on our Platform. In addition, if you use our Platform to send information to another person, we may store your personal information, and the personal information of any recipient and we may use that other person's contact information to allow him or her to access/view such information. We may also use personally identifiable information to troubleshoot, resolve disputes, accomplish administrative tasks, contact you, enforce our agreements with you, including our Platform and this Policy, comply with applicable law, and cooperate with law enforcement activities.

We also collect from our users non-personally identifiable information. This information does not identify a specific user. We, and/or our authorized third party service providers and advertisers, may automatically collect this information when you visit our Platform through the use of electronic tools like cookies and web beacons or pixel tags.

We use non-personally identifiable information to troubleshoot, administer the Platform, analyze trends, gather demographic information, comply with applicable law, and cooperate with law enforcement activities. We may also share this information with our authorized third party service providers and advertisers to measure the overall effectiveness of our online advertising, content, and programming.

#### **5. Is My Personal Data Stored Securely?**

We use best security systems and practices designed to protect your information and to prevent unauthorized access to your data. Examples of our security practices include:

- (i) Sensitive user data, such as account passwords and email addresses, are stored in encrypted

format.

- (ii) Automatic applications and infrastructure are regularly tested for security vulnerabilities and hardened to enhance security and protect against attacks.
- (iii) User data on our database is logically segregated by account-based access rules. user accounts have unique usernames and passwords that must be entered each time a user logs on.

We are committed to handling your personal information with respect and care. However, regardless of the security precautions taken, no physical, internet or other electronic transmission or storage of data can be fully secure or error free. We recommend that you do not share your password with anyone. You should understand this when choosing to use any product or services that include the physical or electronic storage or transmission of your data.

## 6. Release of your Information

We may share your personally identifiable information with other parties in case of the following:

We may share your information with other parties who provide products or services through us. We may share your personally identifiable information with them so that they can contact you regarding a transaction. However, we will only share personally identifiable information if you engage in an identification activity, and then only to those involved in that identification activity. Notwithstanding the above, the Company will only do so with opt-in notice to you, in which you will have a chance to choose that the Company not give them your personal information.

We may share your information for our Protection and the Protection of Others. We may also disclose personally identifiable information when we believe release is appropriate to comply with the law or a court order; enforce or apply this Policy, our Platform Terms of Use or other agreements; or protect the rights, property or safety of the Platform, its Users or others.

## 7. Other Disclosure

We may disclose some or all of the data we collect from you when you use the Platform to Credit Information Company/ies ('CIC') and external collection agencies.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may disclose your personal information to third parties:

- (i) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- (ii) if the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users/customers will be one of the transferred assets;
- (iii) if you authorize said disclosure;
- (iv) in order to: enforce our Terms of Use and other agreements or to investigate potential breaches; report defaulters to any credit bureau;
- (v) engage a third party collections agency; or
- (vi) for the purpose of publishing statistics relating to the use of the Platform, in which case all information will be aggregated and made anonymous.

## 8. Release of Non-Personally Identifiable Information

We may use your data for the purposes of compiling statistics relating to our user base or loan portfolio and may disclose such information to any third party for such purposes, provided that such information is

used anonymously.

We may disclose or share non-personally identifiable information with partners, affiliates and advertisers. For example, we may share aggregated demographic information (which does not include any personally identifiable information) with “third party advertisers” or “third party advertising companies”.

We may use third party advertising companies to serve ads when you use our Platform. These companies may use non-personally identifiable information about your visits to this and other websites in order to provide, through the use of network tags, advertisements about goods and services that may be of interest to you.

We may also use third party service providers to track and analyze non-personally identifiable usage and volume statistical information from our users to administer our Platform and constantly improve its quality. We may also publish this information for promotional purposes or as a representative audience for advertisers. Please note that this is not personally identifiable information, only general summaries of the activities of our users.

## 9. Data Tracking

**9.1 Cookies:** To facilitate and customize your experience with the Platform, we may store cookies on your electronic devices. A cookie is a small text file that is stored on a user’s electronic device for record-keeping purposes which contains information about that user. We use cookies to save your time while using the Platform, remind us who you are, and track and target your interests in order to provide a customized experience. Cookies also allow us to collect non-personally identifiable information from you, like which pages you visited and what links you clicked on. Use of this information helps us to create a more user-friendly experience for all visitors. In addition, we may use Banking Partners and third party advertising companies to display advertisements on our Platform. As part of their service, they may place separate cookies on your electronic device. We have no access to or control over these cookies. This Privacy policy for website use covers the use of cookies by our Platform only and does not cover the use of cookies by any advertiser. Most browsers automatically accept cookies, but you may be able to modify your browser settings to decline cookies. Please note that if you decline or delete these cookies, some parts of the Platform may not work properly.

**9.2 Session Data:** We may automatically log generic information about your computer's connection to the Internet, which we call "session data", that is anonymous and not linked to any personal information. Session data consists of information such as the IP address, operating system, type of browser software being used by you and the activities conducted by you on our Platform. An IP address is a number that lets computers attached to the Internet, such as our web servers, know where to send data back to the user, such as the pages of the site the user wishes to view. We collect session data because it helps us analyze things such as the items visitors are likely to click on most, the manner in which visitors click preferences on our Website, number of visitors surfing to various pages on the site, time spent by the visitors on our Website and frequency of their visit. It also helps us diagnose problems with our servers and lets us better administer our systems. Although such information does not identify any visitor personally, it is possible to determine from an IP address a visitor's Internet Service Provider (ISP), and the approximate geographic location of his or her point of connectivity.

**9.3 Other Tracking Devices:** We may use other industry standard technologies like pixel tags and web beacons to track your use of our Platform pages and promotions, or we may allow our third party service providers to use these devices on our behalf. Pixel tags and web beacons are tiny graphic images placed on certain pages on our Platform, or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, pixel

tags and web beacons generate a non-personally identifiable notice of that action. Pixel tags allow us to measure and improve our understanding of visitor traffic and behavior on our Platform, as well as give us a way to measure our promotions and performance. We may also utilize pixel tags and web beacons provided by our affiliates and/or marketing partners for the same purposes.

## 10. Privacy Policies of Third Party Platforms

This Policy only addresses the use and disclosure of information we collect from you. Other websites that may be accessible through this Platform have their own privacy policies and data collection, use and disclosure practices. If you link to any such website, we urge you review the website's privacy policy. We are not responsible for the policies or practices of third parties.

## 11. Miscellaneous Privacy Issues

**Public Areas:** We may provide areas on our Platform where you can publicly post comments and information about yourself or can review products and submit media content. This information may be accessible by other consumers and companies and may appear on other websites or web searches, and therefore this information could be read, collected, and used by others. For example, if you post your email address along with a public review, you may receive unsolicited messages. We have no control over who reads your postings or what other users may do with the information you voluntarily post, so please use caution when posting any personal information.

## 12. Review

The Company's CEO, CFO and COO have been entrusted with the responsibility of enforcement of this policy. They are hereby given absolute power to jointly or severally, make necessary changes, amendments or additions or removals for the operational aspects of the policy within the overall spirit and guidance from time to time for reasons like technology or process upgradation, regulatory changes, maintaining competitive edge or responding to changes in market or risk environment, etc. This is required to ensure full operational freedom to the senior management and make the management team more adaptive to rapid changing external environment. All changes so made shall be noted to the policy approving authority during the next policy review.

The CEO, CFO and COO can decide on delegation of authority and can design / redesign MIS systems and reporting as they see fit to improve the responsibility and accountability within the team hierarchy.