

Apollo Finvest (India) Limited

Privacy Policy

Privacy Policy of Apollo Finvest (India) Limited (“AFIL”)

Introduction

The contents of this Privacy Policy along with the Terms and Conditions (“**Terms and Conditions**”) available at <https://www.apollofinvest.com> (the “**Website**”) are applicable to all hyperlinks under the Website and the Apollo’s Mobile Application Software (the “**App**”). Any access of AFIL’s Services (defined below) through the Website or through the App or on any other Website of AFIL or other third party sites (“**Service Sites**”) will be governed by this policy which sets out the basis on which any personal data is collected from you or the data that you provide to AFIL and is processed by AFIL. You hereby acknowledge having read and accepted the same by use or access of the App.

This Privacy Policy states the following:

- i. The type of information collected from the users, including personal information relating to an individual;
- ii. The purpose, means and modes of collection, usage, processing, retention and destruction of such information; and
- iii. How and to whom AFIL will disclose such information.

AFIL respects your privacy and recognizes the need to protect the personal data or information which you share with AFIL. AFIL assures to follow appropriate and necessary standards when it comes to protecting your privacy on the App.

The Company, in adherence to CICRA laws (collectively CICRA Act, CICRA Regulations, CICRA Rules) and para 66 of RBI SBR Master Directions, has taken necessary steps to securely handle and safeguard borrower’s credit information ensuring the protection of customer privacy. Further, privacy principles have been adopted that govern data collection, processing, and retention for all forms of credit information, whether obtained directly from customers or through credit reports. In accordance with the regulatory requirements, the Company collects, processes, and reports credit information, including historical data, as per the specified format. Data collection is done with the borrower’s consent and may involve obtaining credit reports from any one or more Credit Information Companies (CICs). This information is utilized for various lawful purposes such as verifying borrower’s identity, assessing creditworthiness, and maintaining accurate records. To ensure the security of the information, necessary technical, operational, and procedural safeguards and protocols have been put in place, as per the Information Security Policy and KYC Policy. Security measures include storing data on secured servers, employing encryption norms, and restricting access to authorized personnel, thereby preventing unauthorized access, misuse, or disclosure of personal information. The Company maintains the accuracy and completeness of records and reports the data as per the frequency defined under the extant regulations, to the CIC. The Company further ensures timely response to

borrower requests for modifications and aligns its practices with applicable RBI regulations for compensating customers for delayed updation or rectification of credit information. The grievance redressal mechanism of the Company for the purpose also includes recourse through the RBI Ombudsman for wrongful denial of compensation.

Consent

By affirming your assent to this Privacy Policy, you provide your consent to such collection, use, storage, processing and disclosure as set out in this Privacy Policy and the Terms and Conditions. The information received by AFIL will not be shared with any third party or third party service providers for the purposes of advertising or marketing. AFIL will only be using the information for providing Services to you.

What Information We Collect

AFIL will track the internet protocol address from which users/individuals access the App and analyze this data for trends and statistics. Along with receiving information from third parties about you, AFIL may also collect your information in the App by information filled in forms or by your correspondences with AFIL, by way of e-mail or chat, registering to use the App, downloading or registering the App, subscribing to any of AFIL's financial services or products ("**Services**"), searching for an App, sharing data via the App's social media functions, entering a competition, promotion or survey and reporting a problem with the App or a Service Site through your computer, mobile phone or any other device which may include, but is not limited to, your internet protocol address, device information including but not limited to identifier, name and type, operating system, approximate location, mobile network information, device phone number, SIM card details, age, username, password and other registration information, financial and credit information including your mobile account details, bank account details, and bank verification number (where applicable), personal description, photograph, time zone setting, information stored on your device including SMS logs, Calendar data, presence of fixed number of apps installed and standard web log information including but not limited to your browser type, traffic to and from AFIL's App, the pages you accessed on AFIL's App, the pages you visited before opening the App, and the webpages you access after you leave the App traffic data, location data, weblogs and other communication data and any other available information. When you use the Services, AFIL may also store information based on your usage history, this includes, but is not limited to, details of your subscription, content you viewed, event information, clickstream information, and cookies that may uniquely identify your browser or your account. AFIL may also store the unique application number provided to you while you install or uninstall a service or when a service searches for automatic updates. AFIL may also collect information about you from any contact you have with any of AFIL's Services or employees, such as, with AFIL's customer support team, in surveys, or through interactions with AFIL's affiliates.

Why We Collect Information

The Information we collect from you or from Third Party Partners are used and processed for (a) Contractual Purposes (b) Legal Obligations (c) Legitimate Interests.

1. Contractual Purposes

- a. providing any of the Services to you including and not limited to determining whether or not to provide a service to you, the applicable terms of such

service and the terms and conditions applicable to such service. We are unable to make this determination unless we collect and process data in accordance with our terms and conditions; or

- b. communicating with you regarding requests about our Services or Services provided to you.

2. Legal Obligations

- a. identification, validation, and verification of your identity;
- b. processing of payment and settlement instructions;
- c. managing investment of funds on your behalf;
- d. collection of loans and any amount outstanding from you;
- e. compliance with any risk, regulatory duty or lawful obligation including responding to regulators or supervisors, carrying out anti money laundering investigations, record keeping obligations, etc;
- f. carrying out risk analysis and assessments of our Services, Service Sites, and market;
- g. compliance with codes of conduct or best practices; or
- h. troubleshooting issues with our Services and Service Sites;

3. Legitimate Interest

- a. fraud detection and prevention of other illegal use of our Services and Service Sites;
- b. improving our Services to you and your experience with us;
- c. offering rewards and other incentives to our customers;
- d. collaborating with Third Parties to provide a Service or to improve our services to you;
- e. educate you about Services or any other information that might be useful to you as our customer;
- f. improving our business, processes, policies, etc;
- g. improve our data quality;
- h. carry out research, experiments, and tests; or
- i. marketing, advertising, and sensitization of our Services;

When you use our services on the mobile App, we also collect the following information from your smartphone;

- Location: An approximate location is used to check your serviceability and to prevent fraud.
- SMS: Our system reviews your financial SMS to understand your financial history and personalise your loan offers.
- Installed apps: Our system checks for the presence of a fixed number of apps installed on your device for fraud detection and to personalise your loan offers.
- Calendar: Our system accesses your calendar to manage and remind you of loan repayment dates.
- Camera: Our system ask for one time access to camera for customer onboarding/said KYC process.

We access this information through your mobile device operating system when you give consent to your device's permissions on our App.

AFIL develops statistics that are helpful to understand how AFIL's Visitors can use the App. AFIL uses this information in the aggregate to measure the use of the App and to

administer and improve the same. This statistical data is interpreted by AFIL in its continuing effort to present in the App, content that Visitors are seeking in a format they find most helpful.

The information AFIL collects and analyzes is completely anonymous and is used to improve the Services and your loan offering. You agree that AFIL or AFIL's third party service providers can collect your IP address or other unique identifier. At times, AFIL also uses these identifiers to collect information regarding the frequency with which the Visitors visit various parts of the App. AFIL, may combine your internet protocol address with other personal information for AFIL's own marketing and for market research purposes, including internal demographic studies, to optimize AFIL's products and Services and customize the App for you.

AFIL may combine your visitor session information or other information collected through cookies, web beacons and other technical methods with any personal information in order to understand and improve your App experience and to determine what products, promotions and Services you prefer or are likely to be of interest to you.

Cookies, web beacons and other technical methods may involve the transmission of information either directly to AFIL or to another party authorised by AFIL to collect information on AFIL's behalf. The information from use of these technical methods may be collected in a form that identifies you personally.

There are times when AFIL may collect personal information from you such as name, physical and email address, citizenship and phone number. If you choose not to provide the information we request, you can still visit the App, but you may be unable to access certain options, offers and Services.

In case you wish to prevent any such usage by AFIL, you are required to inform AFIL within 10 (ten) days of being informed of the proposed use that you do not wish to disclose such information. You can exercise this right at any time by contacting grievanceredressal@apollofinvest.com.

Where We Store Your Personal Data

Wherever AFIL has provided or you have chosen a PIN to access any part of the App or Service Sites, you shall be responsible for keeping the PIN confidential. Also, the data AFIL collects from you and transfers or stores may be at a location/destination outside the country of your origin or residence. The data collected from you may be processed by the staff of AFIL or any supplier or AFIL or a third party operating outside the country of your origin or residence.

Google API Disclosure

AFIL's use of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

Cookies

AFIL's App may store and use "cookies" so that AFIL can serve you better with customized information when you return to the App. Cookies are identifiers that are stored on your equipment's browser directory. They are created when you download or visit our App. They keep track of your movements within the App, help you resume where you left off, remember your registered login and other functions.

Sharing of Information

AFIL may use the personal information that you have shared during the process of registration or otherwise for verification purposes, including your KYC data/documents. You agree and allow AFIL to share such information with our partner lenders for credit underwriting, third parties for verification purposes, credit information companies for reporting and with government agencies, including but not limited to the Reserve Bank of India ("RBI") for the cause of an inspection or any other legal diligences which may be conducted by it. AFIL may also use the information you provide to update AFIL's consumer credit database.

When you visit the App, you agree that AFIL or any of AFIL's partners/affiliates/collection agents may contact you from time to time to provide the offers/information of such products/Services that AFIL believes may benefit you or to get information about any repayments due or any other promotional or transactional information AFIL wishes to receive from you. You agree that AFIL may provide information collected from you to government authorities or credit bureaus as per the rules laid down by RBI or any court of law as per the applicable laws of India.

AFIL or any of AFIL's partners/affiliate/ collection agents may contact you for any promotional, transactional or any other purpose by way of phone, SMS, email, push notification, Calendar notification, etc. However, AFIL does not share the information provided to AFIL by you in any manner to any third parties for the purpose of advertising or marketing campaigns.

It is possible that AFIL may need to disclose personal information when required by law, such as responses to civil or criminal subpoenas, or other requests by law enforcement personnel. AFIL will disclose such information wherein AFIL has a good faith/ belief that it is necessary to comply with a court order, ongoing judicial proceeding, subpoena, or other legal process, or to exercise AFIL's legal rights or defend against legal claims.

Disclosure to Third Parties

AFIL may disclose your personal information to third parties in the following events:

- i. If AFIL sells or buys any business or assets, in which case AFIL may disclose your personal data to the prospective seller or buyer of such business or assets;
- ii. If AFIL or substantially all of AFIL's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;

- iii. If AFIL is under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request; and/or
- iv. In order to report loan activity to any credit bureau; or for the purpose of publishing statistics relating to the use of the App, in which case all information will be aggregated and made anonymous.

Link to Third Party Websites

AFIL may link to third-party websites which may be AFIL's integration partners. These third-party websites may collect information about you on those websites, and AFIL's Privacy Policy does not extend to such third party websites. Please refer directly to the websites of such third parties and their privacy policies.

Security Measures and Procedures

AFIL will not sell, trade or disclose to third parties any information derived from the registration for, or use of, any online Service (including names and addresses) without the consent of the user or customer save and except to any of AFIL's affiliates for helping you in receiving loans or other Services in relation to the businesses of AFIL's affiliates and as may be required by legal process or in the case of imminent physical harm to any persons. Further, AFIL will allow its affiliates to access the information for purposes of confirming your registration and providing you with benefits you are entitled to.

AFIL will take appropriate steps to protect the information you share with AFIL. AFIL has implemented technology and security features and strict policy guidelines to safeguard the privacy of your personal information from unauthorized access and improper use or disclosure. AFIL will continue to enhance AFIL's security procedures as new technology becomes available.

AFIL may transmit the information collected from you through the internet to another country, among AFIL's affiliates, for purposes such as for storage, or for carrying out the processing detailed above, or because of where AFIL's servers are located.

Should you wish to delete your personal data that AFIL acquired from the Facebook platform, you may do so by contacting us at grievanceredressal@apollofinvest.com.

Changes to Privacy Policy

AFIL may change this Privacy Policy from time to time without requiring any consent from anyone. If AFIL's Privacy Policy changes in the future, it will be posted here and a new effective date will be shown. You should access AFIL's Privacy Policy regularly to ensure you understand AFIL's current policies. If you have questions about the Privacy Policy, please email AFIL at grievanceredressal@apollofinvest.com and reference the Privacy Policy in your subject line. AFIL will attempt to respond to all reasonable concerns or inquiries on a best efforts basis within a reasonable period of time.

Governing Law and Dispute Resolution

This Privacy Policy shall be governed in accordance with the laws of India and any disputes arising out of or in connection with this Privacy Policy shall be subject to exclusive jurisdiction of the courts in Mumbai.