

# Privacy Policy

Version 2.0

## DOCUMENT VERSION CONTROL & REVIEW PROCESS TRACKER

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## INTRODUCTION

We know that your privacy is important to you, so we've developed a privacy policy that covers how we collect, use, disclose, transfer and store your personal information.

You agree to this privacy statement by submitting information or microfinance/loan applications to us or our service providers.

A few things to note:

- **You:** When we say “you” in this policy, we mean both you and any other individuals you let use your email or device. As microfinance is for businesses, we expect you are acting in your business capacity.
- **Annapurna Finance Private Limited:** When we say, “we”, “MFI” or “us” we mean AFPL – please see “***Who we are***” below for more information in this regard.
- **Personal information:** When we talk about “personal information”, we mean information that can be used to identify you, such as your name, address, email address, phone number or other personal information. It does not include depersonalised or aggregated information.
- **Referral partners:** When we refer to our “referral partners” we mean the entities, such as the County & City Enterprise Boards or other enterprise agencies or business advisors, which introduce you to us or to whom we refer you – please see “***Who are referral partners?***” below for more information in this regard.
- **Mentors:** when we refer to “mentors” we mean the mentors appointed by our referral partners to assist you with your microfinance application – please see “***Who are mentors?***” below for more information in this regard.
- **External credit assessors:** when we refer to “external credit assessors”, we mean the entities which we engage to assist us in evaluating your microfinance application – please see “***Who are external credit assessors?***” below for more information in this regard.

## HOW DO WE COLLECT YOUR INFORMATION?

We collect personal information when you provide it to us, such as when you contact us, when you visit the MFI branch office or when you apply to us for microfinance loan. While you generally will know when you are providing information to us,

MFI also works with our referral partners and the mentors they appoint who assist microfinance applicants through training and guidance. In some cases, they may submit your microfinance application to us on your behalf – they should do this with your consent.

We may also use service providers, such as external credit assessors, to assist us in assessing your microfinance loan application. They may provide us with information that you give to them or that they create in the assessment of your microfinance application.

We may also collect information from other sources such as those described under “***What information do we collect?***”

If you provide personal information about another person (e.g. in a microfinance application), we will assume that you have that person’s permission to provide us with that information

## WHAT INFORMATION DO WE COLLECT?

- **Information you give us:** Information we ask you to provide us may include, for example, your name, email address, phone number. Where you are submitting a microfinance application, you may have to submit a business plan, cash flow and other detailed financial information such as savings amounts, loan statements and bank statements, billing address, and age or other demographic information. We may also ask you to complete surveys.
- **Information automatically transferred to us:** By using our service, information such as loan detail, purpose & utilisation detail may be

automatically transferred to us.

- **Service providers such as our external credit assessors:** Our service providers may also collect information about you on our behalf. For example, our external credit assessors may contact you to discuss aspects of your loan application. Our service providers have agreed to use your information only for the purposes we request.
- **Information from other sources:** We might receive additional personal information about you from other sources. These other sources include:

**Credit bureaus:** The Credit Bureau may be contacted for the purpose of obtaining details of your current and past credit payment history.

**Banks/Financial Institutions:** We may contact banks/FIs you say declined your credit application to validate information you submitted as part of the microfinance application.

**Others:** Your data will be shared in Mix Market & with SRO

The way in which these other sources collect, use, disclose, and protect information received from or about you is set out in their own privacy statements, not this privacy policy. You are encouraged to review their privacy policies before providing them with personal information. We are not responsible for what they do with your personal information. We may combine and link information from these different sources.

## HOW DO WE USE YOUR INFORMATION?

We use personal information we collect for various reasons. These include:

- to provide you with the products and services you request such as to assess eligibility for a microfinance loan or respond to your queries;
- to tell you about the products and services offered by MFI and our referral partners and to promote the microfinance program;
- to refer you to our referral partners so that they can help you with

your microfinance loan application or provide you with other assistance;

- to respond to your queries;
- to notify you of changes to our policies;
- to conduct surveys, webinars, podcasts, teleconferences or seminars;
- to improve our existing products and services and develop new ones; and
- to otherwise operate our business.

If you submit a query to us, we may also follow up with you subsequently to make sure you have no more queries or to tell you more about our products or services.

We may (subject to applicable law) also combine and link your personal information with information we obtain from other sources. This could occur, for example, in circumstances where we receive new, updated or additional information from the referral partners or mentors regarding your microfinance application.

As part of providing you with enhanced microfinance services, we may use personal information we collect to analyze your usage habits (which lets us continually customise and improve our services)

## DISCLOSURE OF YOUR INFORMATION

We are not in the business of selling your personal information to third parties. We will disclose your personal information to third parties from time to time including in the following circumstances:

- **Consent:** we get your consent;
- **MFI parent:** we may give information to our parent company.
- **Referral partners or mentors:** we may pass information about you to our referral partners or the referral partner mentors with your consent.
- **Credit bureaus:** we may provide details of your microfinance payment history to the Credit Bureau or banks.
- **Debt Collection Agencies:** MFI may use these agencies if your

microfinance repayments fall into arrears.

- **External Credit Assessors:** MFI may provide personal information to external credit assessors that we appoint to assist us in the assessment of your microfinance application. They may contact you directly.
- **Required by law:** we are required to by applicable law, legal process or governmental authorities.
- **Protection:** we believe disclosure is necessary to protect our rights, our customers or others.
- **Illegal activities:** to investigate, prevent or take action regarding illegal activities, suspected or potential fraud transactions (such as unauthorised use of our services).
- **Third party service providers:** they provide services to us (such as external credit assessors) and have agreed to use your information only for the purposes we request.

We want to promote microfinance success stories so others like you can use microfinance to benefit their business. If you agree to participate in a microfinance promotional campaign, your personal information may be disclosed in connection with such a campaign with your consent.

## WHO WILL CONTACT YOU ABOUT YOUR MICROFINANCE LOAN?

MFI and its service providers (e.g. external credit assessors) may contact you directly by phone, email or post in connection with your application for microfinance and may also ask to meet you in this regard.

## WHO ARE REFERRAL PARTNERS?

When we refer to our “referral partners” we mean the entities, such as the insurance agency, pension agency or other agencies or business advisors, which introduce you to us or to whom we refer you.

Our referral partners have their own policies that govern their collection, use, and disclosure of information. We suggest that you read their privacy policies to learn about their practices, as we are not responsible for them.

## WHO ARE MENTORS?

Our referral partners will often allocate an individual to mentor you in connection with your microfinance application. These individuals are referred to as “mentors”.

Mentors operate independent of us when providing you with assistance and training. They are engaged by our referral partners. We are not responsible for the quality of their service. Please see “*who are referral partners*” for more information in this regard.

## WHO ARE EXTERNAL CREDIT ASSESSORS?

In some cases, we engage third parties to assist us in connection with the assessment of your microfinance application. These third parties are referred to as “external credit assessors”. They provide services to us and have agreed to use your information only for the purposes we request.

## WHO WE ARE?

Annapurna Finance Private Limited is NBFC, Registered under Indian Companies Act, 1956 as a private Limited company limited by shares.

## QUESTIONS

If you have any questions about this policy, please send an email to [gro@ampl.net.in](mailto:gro@ampl.net.in) or send a letter to, Annapurna Finance, Plot No. 1215/1401, Khandagiri Bari, Infront of Jayadev Vatika, PS/PO- Khandagiri Bhubaneswar Khordha OR 751030.

### **Grievance Redressal Officer (GRO):**

**Mr. Subrat Sabyasachi Roy,**

Annapurna Finance Private Limited

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