



Privacy Policy

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PRIVACY POLICY

1. Who is covered under this policy?

This policy is applicable to the customer and User ("User"/ "You") who avail or intend to avail services from Kinara Capital, a registered trademark of Kinara Capital Private Limited (formerly known as Visage Holdings and Finance Private Limited), a Non-Banking Financial Company incorporated under the Companies Act, 1956, and registered with the Reserve Bank of India; Regn No: B-02.00255, having its Registered Office at #50, 2nd Floor, 100 Feet Road, HAL 2nd Stage, Indiranagar, Bangalore-560038.

We at Kinara Capital, are committed to protecting the privacy and security of your personal information. Your privacy is important to us and maintaining your trust is of topmost priority in our service. This Privacy Policy explains how we collect, use, process and disclose information about you. By using our website/app and affiliated services, you consent to the terms of our privacy policy ("**Privacy Policy**") in addition to our Terms of Use. We encourage you to read this Privacy Policy regarding the collection, use, and disclosure of your information from time to time to keep yourself updated with the changes & updates that we make to this Policy. We recognize the importance of sensitive personal information and take reasonable measures to keep such information confidential. Information provided by Users or customers will only be used/evaluated for the purpose of servicing you with Kinara Capital's products or services.

This Privacy Policy describes our privacy practices for our website, www.kinaracapital.com; the myKinara Mobile and web applications, and other online applications, products and services that are linked to us and owned and operated by Kinara Capital. This policy has been published in compliance with the Information Technology Act, 2000 read with Information Technology (Intermediaries guidelines) Rules, 2011 and Information Technology (Reasonable Security practices and procedures and sensitive personal data or information) Rules, 2011 and applicable Reserve Bank of India (RBI) guidelines, regulations, directions, circulars including but not limited to Master Direction - Know Your Customer (KYC) Direction, 2016, and any other applicable regulations for the time being in force, as may be amended from time to time ("**Applicable Laws**").

2. Information covered by this policy

This policy seeks to cover all such information that we collect from our Users and/or that you provide us as mentioned below:

- Any personal/sensitive personal information that the Users provide to Kinara Capital by filling in forms in the mobile app or web for the purpose of loan application or customer service such as name (First Name, Middle name, Last name), KYC documents such as PAN card, Aadhaar, Voter ID etc., date of birth, e-mail address, gender, mobile number, location of the user, bank statements etc. provided to Kinara Capital.
- Any information that Users provide by directly writing to Kinara Capital, through direct interaction or through automated interactions and technologies (browsing actions, cookies etc.) or over the telephone or indirectly from publicly available sources as well as various third parties, such as service providers, credit bureaus, KYC registry, alliance partners, account aggregators.
- Personal/sensitive personal information available on and fetched from Central KYC Records Registry (CKYCR).

- Any information that Users provide to Kinara Capital through its similar online channels including but not limited to chatbot, WhatsApp, SMS, etc.
- Any information that may be collected by Kinara Capital from the User's browser or mobile app including any information, which may or may not be personally identifiable and/or traffic information and/or any information which may be collected by Kinara Capital, its affiliates/agents/agencies, including our server from the User's browser with the explicit consent of the Users taken from time to time
- Any information that is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal information for the purposes of this Policy.
- Following the services availed by You from time to time, we may explicitly seek additional information including bank details, payment information, credit/debit card details / UPI information and any other governmental identification numbers or documents. You may choose to provide such information if you wish to use the services provided by our App/website/customer service channels for our products on the digital platforms.
- Kinara Capital may have a presence on social networking websites including but not limited to LinkedIn, Facebook, Twitter, Instagram, YouTube and Blogs which are promotional and business initiatives to connect to a larger group of people. The domain links contained therein may either direct you to our Website or request your participation by way of feedback, or suggestions.
- We will also maintain a record of the information you provide to us when using customer support services.

3. Information provided by the user and collected through Apps and websites:

Kinara Capital may collect and use technical data and related information, including but not limited to, technical information about your device, system and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other services to you (if any) related to such Mobile Applications, for which consent will be taken from time to time, during the loan application journey of the customer.

When you use our myKinara Mobile Application, the Mobile Application may automatically collect and store some or all of the following information from your mobile device ("Mobile Device Information"), in addition to the Device Information, including without limitation:

- Preferred Language, Name, Business Name, Business-related details, Pin code, Email Address, Mobile number, gender, residential/correspondence address, date of birth, marital status, geo-location or Other contact information
- KYC Documents, Bank Statements, Photograph
- Bank account or other payment instrument details

- Any other detail for providing services.

For accessing the above information for the purpose of customer service via your mobile device, the myKinara Mobile app will request device permissions such as camera access, and geo-location, etc. prior to accessing the device settings. Customers are requested to provide consent to access the device against every such request being made by the system. The access taken for camera, microphone, location, etc. are for the purpose of customer onboarding/ KYC requirements only. In some scenarios, only with your express consent for every such request, we may access SMS, contacts and call logs in order to enable us to provide service.

We use other Information for the purposes including but not limited to troubleshooting connection problems, administering the Website and the myKinara Web application, analyzing trends in the market, gathering demographic information, to ascertain how our visitors use our Website/Web application, including information relating to the frequency of visits to our Website/Web application, the average length of visits, pages viewed during a visit, ensuring compliance with the applicable law, cooperating with law enforcement activities, etc. This information is used to improve the Website content and performance

The Users can opt to give consent or deny the consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the app forget the data or even delete the app entirely.

The information including but not limited to personal/sensitive personal information of the Users which are provided by the Users or which we are likely to capture for processing the loan or otherwise are categorized below:

Type of Information	Details of the Information Provided/Captured
Location Information	Pin code, Geo tag, Property Information, Address, etc.
Personal Information	Name (Applicant, Co-applicant, Guarantor (If any) – All parties for the application)
	Email ID & Mobile number of all parties
	Gender & Date of Birth of all parties
	Address of Applicants & Business
Live Picture and Photographs and Videos	Photos of the loan applicants/co-applicant/guarantor, Photos of property, business location, residence, etc.
Proof of Identity or Address	Pan Card/Driving License/Passport/VoterID/Aadhaar Card, and/or any other RBI accepted proof of identity/proof of Address/Signature Proof, etc.
Financial Information	Income/Turnover details, details of financial liabilities, Bank Name, Bank account details, Passbooks/Account statements, etc.

Business Documents	Proof of Business, Business License details including registration documents, GST or ITR filing details, Udyam registration details, Tax Certificates, etc.
Bureau Details	Credit Reports extracted through listed/partnered Bureaus registered under the Credit Information Companies (Regulation) Act, 2005
Technical Information Captured	Type of Device, Browser details, Internet service provider details, Operating System details, Geo tagging, Activities on the web, applications or URL's being used, IP address, Information from the transactional or promotional SMS or emails.

4. Information we collect from third parties/shared with the third parties:

The Users provide their explicit consent for the following:

- i. Share and use personal information/sensitive personal information of the User with Credit bureaus to check if User meet the loan eligibility. For example, Transunion CIBIL, CRIF Highmark, Experian, and Equifax which are credit information companies registered under the Credit Information Companies (Regulation) Act, 2005 who are among our partners.
Share personal information/sensitive personal information of the User with account aggregators (registered with RBI) to fetch financial information of the User.
Share and use its personal information/sensitive personal information for verifying, checking, downloading, fetching its KYC data from one or more KYC registries using the KYC identifier (such as PAN, Aadhaar). Once, the User is onboarded, we may upload and/or update your KYC data with KYC registries such as Central KYC Registry and CERSAI, and the transaction details with the credit bureaus mentioned above, which is a regulatory requirement.
- ii. To receive information from Central KYC Registry through SMS/Email on my registered number/email address provided to you.
- iii. Kinara Capital may also employ third-party service providers including Co-lending partners and individuals for the following:
 - To facilitate our service
 - To provide the service on our behalf
 - To perform service-related functions or
 - To assist us in analyzing how our service is being used

User is hereby informed that the third-party service provider/agent/agencies will have access to your personal information/sensitive personal information on a "need to know" basis to assist Kinara Capital in rendering services and are restricted from using the same for any other reason. The third-party service provider is obligated not to disclose or use the information for any other purpose. Kinara Capital follows Reserve Bank of India's directions on managing risks and code of conduct in outsourcing of financial services by NBFCs, wherever a third-party partner is involved.

5. How we use the information that we collect:

Any information provided by you will be used for creating and updating your account and processing your

transaction(s) or for any other purposes for which you have granted access to such information to us, based on your interaction with myKinara mobile App/web applications, chatbot, WhatsApp, SMS and Kinara Capital's official Website as well as our Offline Loan Application and Support Processes.

We may use, store and process the information provided by you to:

- Improve the services offered through the myKinara App / web application and other digital platforms
- Create and maintain a trusted and safe environment on our website/applications owned by us
- Provide, personalize, measure and improve the performance of the products and services offered

Under our mobile, web applications and other digital platforms. The information collected through different channels, allows us to collect statistics about our website/app usage and effectiveness, personalize your experience whilst you are on our website/app, as well as customize our interactions with you and enhance the scope of our Services.

Any Information provided by you will be used for the creation of a unique customer ID with Kinara Capital, for availing any further services with us. We may use the information collected to perform internal operations necessary to provide our services, including troubleshooting software bugs and operational problems, conducting data analysis, testing and research and monitoring and analyzing usage and activity trends. We process this personal information for these purposes given our legitimate interest in improving the services.

In order to expand the scope of our services or due to regulatory requirements, we may from time to time, seek additional information from you. Any such collection of additional information and documents shall be subject to an explicit & purpose-specific consent wherever applicable.

We may also contact you, via email/phone for any customer surveys for market research purposes, or marketing communications that we feel might interest you, or send any communication including any content of advertisements or other notifications.

We use the information we collect (including recordings of customer support calls) to assist you when you contact our customer care services to investigate and resolve your queries and monitor and improve our customer support responses. Certain online transactions may involve us calling you. This may also involve online chats. Please be aware that it is our general practice to monitor and, in some cases, record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.

We intend to protect your personal information/sensitive personal information and maintain its accuracy as confirmed by you. We implement reasonable physical, administrative, and technical safeguards to help us protect your personal information from unauthorized access, use, and disclosure.

We blend security at multiple steps within our products with state-of-the-art technology to ensure our systems maintain strong security measures. We do not ask for any personal and sensitive information like credit card details, Net banking Passwords, CVV of cards, banking transaction OTP's etc.

We ensure that the data collected through various means are stored only in servers located within India. We also ensure compliance with the statutory obligations and regulatory instructions.

6. Data Safety/Security:

Kinara Capital, Website and apps ensures encryption of collected personal information/sensitive personal information in transit and stores it in a secure way. We may share some of this data in compliance with our legal obligations (such as anti-money laundering regulations). Our data retention policies are governed by regulatory bodies.

Kinara Capital intends to protect your personal information/ sensitive personal information and maintain its accuracy as confirmed by you. Kinara Capital continuously strives to implement reasonable physical, administrative, and technical safeguards to protect your personal information from unauthorized access, use, and disclosure. But, remember that no method of transmission, whether in physical form or over the internet, or method of electronic storage is 100% secure and may be subjected to unintentional risks, due to reasons beyond our control.

Kinara Capital reserves the right to disclose information shared by you when required or permitted by law and we have a good-faith belief that (i) such action is necessary to comply with an appropriate law enforcement investigation, current judicial proceeding, a court order or legal process served on us or (ii) to conform to the legal requirements, compliance/reporting to administrative and judicial authorities, as may be required (iii) protect and defend the rights or property of the website of Kinara Capital, or the Users of Kinara Capital, (iv) person(s) or company (ies) who provide certain support services to us, or (v) person(s) or company (ies) who share certain responsibilities/obligations of Kinara Capital and (vi) to third parties/ service partners for providing you services offered by such third parties and service partners. Further, we reserve the right to disclose information shared by you without your consent with entities engaged in providing the credit scores or credit information related services like CIBIL, Highmark, Experian, Equifax etc.

7. Data Retention

If you wish to delete your account or request that we no longer use your personal information/sensitive personal information provided you have fulfilled all your contractual obligations, please write to us at help@kinaracapital.com. However, we will retain and use your personal information/sensitive personal information as necessary to comply with applicable law, resolve disputes and enforce our contractual obligations.

8. Links to Other Sites:

Our website may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that such external sites are not operated by us. Therefore, Kinara Capital strongly advises you to review the Privacy Terms of such external websites. Kinara Capital has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services. Under no circumstances shall we be deemed to control or guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, cookies, messages or other materials available on such platforms.

9. Responsibility of User:

User acknowledges the following:

- a) Kinara Capital and/or its employees/personnel/assigns will not contact the User directly for disclosure of any personal information/sensitive personal information unless required for the purpose of providing Users with products or services they have expressed interest in. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting you before disclosing any personal information/sensitive personal information by reaching out to Kinara Capital's nearby branch office or official customer care number published on its website www.kinaracapital.com before deciding to make any disclosure.
- b) User shall not hold Kinara Capital liable/responsible for any breach of privacy owing to your negligence and hereby waive off from making any claims/demands/compensation against Kinara Capital.

- c) User shall only use the official website/links of Kinara Capital for availing products/services by inputting the domain information on the address bar.
- d) User is completely aware about the potential risk of data/privacy breach and User hereby confirms that User shall be solely liable for any unauthorized disclosure/breach of personal/sensitive personal information, etc. and any direct/indirect losses suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal information/sensitive personal information (including but not limited to any passwords, financial information, account details, etc.) are not shared/stored/made accessible through:
- i. Any physical means with or without User's knowledge (disclosure to any person/third-party; etc.) Or
 - ii. Any electronic means, by exercising the following precautions/safety measures:
 - User shall always check if "https" appears in any website's address bar before making any online transaction, to ensure that the webpage is encrypted;
 - User shall avoid using third party extensions, plug-ins or add-ons on the/your web browser, as it may result in the risk of tracking or stealing of my personal details;
 - User shall always type the information and not use the auto-fill option on web browser to prevent the risk of storage of my personal/sensitive personal information;
 - User shall not access darknet, unauthorized/suspicious websites, suspicious online platforms, downloading applications from unreliable sources.
 - User shall ensure to disable cookies before accessing any domain/website, to ensure that User's personal information is not tracked by any third party, unless otherwise consciously permitted by user by accepting the same, for which, User alone will be responsible for the consequences thereof
 - User shall not respond to any generic emails from an unknown/unidentified source
 - User shall check the Privacy Policy of the website/application to know the type of information that may be collected from User and the manner in which it may be processed by the website/application before accepting/proceeding/transaction on any website/application;
 - User shall always verify and install authentic web/mobile applications from reliable source on User's computer/laptop/tab/iPad/smart phone or any other electronic device;
 - User shall NOT access any unidentified weblinks

We suggest you agree that you shall not engage in any activity of data scraping or data crawling on the platform and usage of web crawling or web scrapping software for accessing the platform would be considered to be an unauthorised access.

10. Changes to the Privacy Policy:

Kinara Capital may update our Privacy Terms from time to time. Thus, you are advised to review this page periodically for any changes. Kinara Capital will notify you of any changes by posting the new Privacy Terms on Kinara Capital's website. These changes are effective immediately after they are posted on Kinara Capital's website. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing the platform for availing the services. Your continued use of the Services following the posting

of changes to this Privacy Policy will constitute Your consent and acceptance of those changes.

11. Contact Us:

If you have questions, concerns, or suggestions regarding our Privacy Policy, you may get in touch with us through various contact options displayed on <https://www.kinaracapital.com/contact-us/>.

In order to effectively address customer grievances, Kinara has introduced multiple channels of communication. A Customer can raise a complaint or express their dissatisfaction on the company service through the below channels:

- Walk into our Branch and speak to the Branch Manager
- Call us on our toll-free number 1800-103-2683 and speak to our customer care agent.
- Email us at help@kinaracapital.com
- Raise a complaint on our website - www.kinaracapital.com/contact-us/
- Send us letters to our registered address:

The Customer Grievance Redressal
Officer # 50, 2nd floor, 100 feet road,
HAL 2nd Stage, (Defence Colony),
Indiranagar, Bengaluru, Karnataka - 560038.

For further details on our Grievance Redressal Policy, please go to <https://www.kinaracapital.com/customer-grievance-redressal-policy/>

12. Customer / User Consent:

By accessing our mobile application, Website and other related web pages or by giving us your personal information/sensitive personal information, the User expressly consent to Kinara Capital to collect, maintain, process the personal information/sensitive personal information provided, and also disclose the information in accordance with this privacy policy.