

**LAXMAN FINANCE PRIVATE LIMITED**

**PRIVACY POLICY**

Date: 17-11-2025

Version-02/25-26

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## PRIVACY POLICY

### 1. INTRODUCTION

Laxman Finance Private Limited ("LFPL") is registered as a non-deposit taking Non-Banking Financial Company (NBFC) with the Reserve Bank of India (RBI). The Company is categorised as a Base Layer NBFC (NBFC-BL) under the Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 dated 19 October 2023 and as updated from time to time (RBI Scale Based Regulations).

LFPL is committed to maintaining the privacy and security of the company, its customers, employees, vendors, contractors, and partners' data. This Privacy Policy ("Policy") outlines LFPL's practices and measures in place to ensure compliance with applicable laws and regulations regarding privacy including the following:,

- a) RBI Scale Based Regulations.
- b) Information Technology Act, 2000 and Information Technology (Intermediaries Guidelines and Digital Media Ethics Code) Rules, 2021 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.
- c) Other applicable acts, regulations and rules which require the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information and all applicable laws, regulations, guidelines provided by applicable regulatory authorities including but not limited to the RBI.

LFPL is committed to processing data with transparency, fairness, and in accordance with the highest standards of security to protect the privacy rights of individuals.

### 2. IMPORTANT DEFINITIONS

**Customer** shall mean any individual or entity who is a registered user or a borrower of the Company.

**Data** for the purpose of this Policy, Data shall mean as provided under clause 5.1 of this Policy.

**Processing** in relation to personal data or information means an automated operation or set of operations performed on personal data, and may include operations such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.

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**Services** means any of the service(s) that are provided by Company to its Customers and/or users by way of any Company information resources including lending services.

**Third Party** shall mean and include Company's group entity(ies), third party vendors (of any nature whatsoever) and/or consultants, advisors, partners, banks, financial institutions, credit bureau/ agencies, identity authenticating agencies (National Securities Depository Limited ['NSDL'], Unique Identification Development Authority of India ['UIDAI'], State Transport Department, etc., regulatory or statutory bodies.

### 3. SCOPE AND APPLICATION

#### 3.1 Scope

This Policy applies to all data processed by LFPL in the course of its operations gathered through any website, mobile application, platform, etc. , as and when applicable and used by LFPL, including but not limited to:

- Customer Data collected for loan processing and management
- Employee and contractor Data
- Partner/vendor Data
- Any other Data that LFPL processes as part of its business activities

#### 3.2 Geographic Application

This Policy applies to all Data processing activities conducted by LFPL within India and any international data transfers that may occur in the context of LFPL's business operations.

### 4. PRIVACY PRINCIPLES

LFPL adheres to the following key principles in the processing of data:

#### 4.1 Lawful, Fair, and Transparent Processing

Data shall be processed in a lawful, fair, and transparent manner. LFPL shall inform individuals about the purpose of data collection and obtain their consent prior to processing.

#### 4.2 Purpose Limitation

Data shall be collected only for specific, legitimate purposes and shall not be further processed in ways incompatible with those purposes.

#### 4.3 Data Minimization

LFPL shall collect only the minimum amount of data necessary for the specified purposes.

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#### 4.4 Accuracy

Data must be accurate, and where necessary, kept up to date. Inaccurate or incomplete data must be rectified or erased.

#### 4.5 Storage Limitation

Data shall be retained only for as long as necessary for the purposes it was collected or as required by applicable laws and regulations or under the consent provided by the customer. The Data will be stored only in servers located within India.

#### 4.6 Integrity and Confidentiality

Data shall be processed in a manner that ensures its security, including protection against unauthorized access, disclosure, alteration, or destruction.

#### 4.7 Accountability

LFPL shall implement appropriate technical and organizational measures to ensure compliance with this Policy and to demonstrate accountability.

### 5. DATA COLLECTION AND PROCESSING

Wherever possible, we indicate the mandatory and the optional fields. You always have the option to not provide any information by choosing not to use a particular Service or feature on the Platform. You shall be provided with an option to give or deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data.

#### 5.1 Types of Data Collected

LFPL collects the following types of data:

- **Personally Identifiable Information (PII):** Name, address, phone number, email, government-issued identification number (e.g., Aadhaar, PAN).
- **Financial Information:** Bank account details, credit history, loan repayment history, income details.
- **Sensitive Personal Data:** Biometric data, health information, etc. (if applicable).
- **Employee Data:** Employment history, qualifications, performance evaluations, etc.
- **Vendor/Partner Data:** Company name, contact details, financial records.

#### 5.2 Purpose of Data Collection

The primary purposes for which LFPL collects data include:

- Customer verification and due diligence for lending activities.
- Credit risk assessments.

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- Compliance with regulatory requirements.
- Employee management and payroll processing.
- Vendor management.
- Marketing and communication (with prior explicit consent).
- Fulfilling the customer requests for products and services offered and subscribed and accepted by customer.
- Delivering to customer any administrative notices, alerts, advice and communications relevant to customer's use of the service.
- Share customer's Data with any Third Parties in so far as required for purpose of providing additional services and / or to similar services to provide customer with various value-added services
- Third-Party contractors that provide services to LFPL, are bound by similar privacy restrictions
- Managing phone calls and Short Message Services ['SMS']/texts, sending reminders, etc. Undertaking activities as may be permitted under law/regulations/directions/guidelines or by any authority or under any license or registration of LFPL

The Data so collected shall be used only for the purpose otherwise as may be expressly consented by the Customer. All such Data collected shall be retained so long as Customers are having account with LFPL and remain active to avail various services and/or as may be required under the law or by any authority. In case of deactivation / termination of the account / services with us, the Data provided will no longer be used unless consented for.

### 5.3 Consent Management

Before collecting personal Data, LFPL will obtain explicit consent from the person about whom the data is collected, clearly outlining the purpose and scope of data processing. Consent will be obtained in writing or electronically accessed by LFPL or Third Party as per the Consent provided by the Customer to Access the Data with an audit trail of the purpose/ usage to provide Services under the terms of use. This personal Data collected from Customers is solely for the Purposes provided under this Policy and the Consent provided by the Customer. Access, storage and usage of Data by the LFPL shall be as permitted/ allowed under extant statutory and regulatory guidelines. For the purpose of this Policy, '**Access**' shall mean and include access, collection, storage, sharing, monitoring.

### 5.4 Data Updation:

LFPL encourages the Customers to update this information as and when there are any changes. The Customer is also entitled to review the information provided and ensure that any Data/ personal information found to be inaccurate or deficient be corrected or

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amended as feasible. However, LFPL shall not be responsible for unverified, inaccurate or un-updated Data supplied or Accessed from the Customers.

## 6. DATA SUBJECT RIGHTS

### 6.1 Right to Access

Individuals have the right to request access to their personal data held by LFPL, including information about the purposes of processing and the categories of data involved.

### 6.2 Right to Rectification

Individuals have the right to request correction of inaccurate or incomplete personal data.

### 6.3 Right to Erasure

Individuals may request the deletion of their personal data when it is no longer necessary for the purposes for which it was collected or when they withdraw their consent.

### 6.4 Right to Restriction of Processing

Individuals may request the restriction of processing of their personal data in certain circumstances, such as when they contest the accuracy of their data or object to its processing.

### 6.5 Right to Data Portability

Individuals have the right to request the transfer of their personal data to another organization, where technically feasible, in a structured, commonly used, and machine-readable format.

### 6.6 Right to Object

Individuals have the right to object to the processing of their personal data, particularly when the processing is based on legitimate interests or for direct marketing purposes.

## 7. DATA SECURITY MEASURES

LFPL implements technical, organizational, and physical security measures to protect personal data against unauthorized access, loss, alteration, or destruction, including:

### 7.1 Encryption

Data, especially sensitive personal information, is encrypted both in transit and at rest to protect against unauthorized access.

### 7.2 Access Controls

Strict access controls are enforced to ensure that only authorized personnel have access to personal data. Access is granted based on the principle of least privilege.

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### 7.3 Regular Audits

Regular security audits are conducted to identify vulnerabilities and ensure compliance with data protection measures.

### 7.4 Employee Training

Employees are trained on privacy principles, security practices, and the handling of personal data. Such training shall be held at periodic intervals as the Company may decide in this regard.

## 8. RETENTION AND DELETION OF PERSONAL DATA

### 8.1 Retention Period

- Personal data shall be retained only for as long as necessary to fulfill the purpose for which it was collected, and as required by applicable regulatory and legal obligations. LFPL will comply with retention periods prescribed under:
- Other applicable acts, regulations and rules which require the publishing of a privacy policy: Personal data must be retained only for as long as necessary for the processing purposes.
- RBI Regulations: LFPL will ensure the retention of customer data for the time specified under RBI regulations for financial records and audit purposes.

### 8.2 Deletion of Personal Data

Once the retention period expires or if data is no longer needed for the purpose it was collected, the data will be securely deleted or anonymized to prevent further use.

## 9. DATA TRANSFERS

### 9.1 Data Transfers within India

Data of the Customers will not be sold or otherwise transferred to unaffiliated third parties except if otherwise stated at the time of collection/Access or under Consent obtained from the Customer or as required under law.

LFPL treats Customer's Data as private and confidential and does not check, edit, or reveal it to any third parties except as provided under this Policy or where it is expressly agreed and where it believes in good faith, such action is necessary to comply with the applicable legal and regulatory processes or to enforce the terms of service. LFPL may disclose personal information where it is under legal obligation to do so or where it is mandated under law or directed by any authority. Subject to the provisions of this Policy, LFPL may transfer Data to another Indian body corporate that ensures the same level of data protection that is adhered to by the Company, if it is necessary for the performance

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of a lawful contract between LFPL or any person on Customer's behalf or where Customer have consented to the data transfer.

#### 9.2 International Data Transfers

If personal Data is transferred outside India, LFPL will ensure that such transfers are made in compliance with applicable laws and ensure that the Data recipients provide an adequate level of protection.

### 10. PRIVACY COMPLIANCE AND MONITORING

#### 10.1 Monitoring

LFPL will regularly monitor and review its privacy practices to ensure compliance with this Policy, as well as with evolving legal and regulatory requirements.

#### 10.2 Incident Reporting

Any data breach or security incident must be reported to the DPO immediately. LFPL will assess the impact of the breach and notify affected individuals and the relevant authorities as required by law.

### 11. COOKIES

If enabled, we may place cookies on your machine that store small amounts of data on your computer about your visit to any of the pages of this website. Cookies can identify the pages that are being viewed, and this can assist us in tracking which of our features appeal the most to you and what content you may have viewed on past visits.

These technologies are used in analyzing trends, administering the Site, tracking users' movements around the Site, and to gather demographic information about our user base as a whole. Third-party vendors, including www.google.com ("Google"), may use cookies to serve ads based on your visits to this Website. You may visit the website of the third party and choose to opt-out of the use of cookies for interest-based advertising if the third party offers such an option.

We use cookies on our website to personalize our Service to you. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited. You may refuse to accept cookies by activating the setting on your browser, which allows you to reject the setting of cookies. Unless you have adjusted your browser setting to reject cookies, our system will issue cookies when you log on to the website.

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## 12. CONTACT INFORMATION

Name	Urvashi Jayeshbhai Gandhi
Address	305, III Floor, Amrut Commercial Centre, Sardar Nagar Main Road, Rajkot 360001, Gujarat.
Contact no.	+91 9664739885
Email	complaints@laxmanfin.com

The Grievance Redressal Officer can be contacted between 10:30 a.m. to 6:00 p.m. from Monday to Friday except on public holidays.

For any privacy related concerns, kindly write to us at [complaints@laxmanfin.com](mailto:complaints@laxmanfin.com)

By simply visiting the portal at <https://laxmannbfc.in> customers can easily submit their queries, requests, or complaints.

For withdrawal of consent/ deletion of data or account, kindly write to us at [info@laxmanfin.com](mailto:info@laxmanfin.com).

## 13. POLICY REVIEW

This Privacy Policy will be reviewed periodically and updated as necessary to reflect changes in laws, regulations, and business practices. LFPL is committed to ensuring that this Policy remains up-to-date and in line with the latest data protection standards.

## 14. OMNIBUS CLAUSE

All extant & future master circular/directions/guidance/guidance notes issued by RBI and other applicable regulations from time to time would be the directing force for the Privacy Policy and will supercede the contents of this Policy.

## 15. ANNEXURE

### 15.1 TERMS AND DEFINITIONS

Term	Definition
<b>Personal Data</b>	Any information relating to an identified or identifiable individual.
<b>Sensitive Personal Data</b>	Personal data that includes details such as biometric data, financial information, health data, etc.
<b>Data Subject</b>	An individual whose personal data is processed by LFPL.

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<b>Data Processing</b>	Any operation performed on personal data, including collection, storage, modification, or deletion.
<b>Data Breach</b>	A breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorized access to personal data.

## 15.2 ABBREVIATIONS

<b>Abbreviation</b>	<b>Description</b>
<b>RBI</b>	Reserve Bank of India
<b>DPO</b>	Data Protection Officer
<b>PII</b>	Personally Identifiable Information
<b>MFA</b>	Multi-Factor Authentication
<b>OTP</b>	One-Time Password