

Dvara E-Registry Private Limited Privacy Policy

Welcome to the Dvara E-Registry's Privacy Policy applicable to the Credit Product facilitated through its Lender Partners.

This Privacy Policy is applicable to all Customers from whom Krishak Sathi collects required information for the Credit Product facilitated through its Lender Partners. Any dispute with Dvara E-Registry over privacy matters are subject to this Privacy Policy read in conjunction with the Terms and Conditions.

1. Definition:

- i. **“Credit Product”** shall mean the facilitation of loan extension to the customers through its Lender Partners.
 - ii. **“Customer(s)”** shall mean such person desirous of availing the Credit Product.
 - iii. **“Krishak Sathi”** shall mean such personnel who are onboarded by Dvara E-Registry for services in connection with the Credit Product facilitated through its Lender Partners.
 - iv. **“Lender Partners”** means and includes a bank, association, company, partnership or any such entity whose facilities are used by Dvara E-Registry to facilitate Credit Product to its Customers.
2. This Privacy Policy is published in compliance of:
- i. Section 43A of the Information Technology Act, 2000
 - ii. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPI Rules”) “Personal Information” and “Sensitive personal data or information” shall be as defined under the SPI Rules.
 - iii. Applicable laws/ guidelines issued by Reserve Bank of India
3. In order to avail the Credit Product facilitated by Dvara E-Registry (**“Purpose”**), Customer(s) are required to provide such information and data (**“Personal Information”**), classified as ‘Sensitive Personal Information’ under Regulation 3 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (**“SPI Rules”**) and such other information as mentioned below to Dvara E-Registry through the Krishak Sathi. Personal Information provided in acceptance of this Policy shall amount to written consent under Regulation 5 of the SPDI Rules.

| S.No | Type of Information | Purpose of Collection | Storage period |
|------|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------------------------|
| 1. | Basic details like Name, Age, Gender, Date of Birth, Mother's name, Father's name, Address, Occupation, Marital Status, Photograph etc. | Underwriting | Permanent |
| 2. | Pan card | Verify Identity | Till Lender Partner approves/ rejects the Loan |
| 3. | Driving License | Verify Identity and address | Till Lender Partner approves/ rejects the Loan |
| 4. | Voter Id | Verify Identity and address | Till Lender Partner approves/ rejects the |

| | | | |
|----|---------------|-----------------------------|------------------------------------------------|
| | | | Loan |
| 5. | Aadhar number | Verify Identity and address | Till Lender Partner approves/ rejects the Loan |

Customer(s) hereby provides his/ her consent share the above information collected to any of the following Lender Partners for the Purpose:

- i. DCB Bank Limited
- ii. Samunnati Financial Intermediation & Services Private Limited
- iii. Agriwise Finserv Limited
- iv. Avanti Finance Private Limited
- v. Monexo Fintech Private Limited
- vi. Shivalik Small Finance Bank
- vii. IDFC FIRST Bank Limited
- viii. Axis Bank

2. Furthermore, for the fulfilment of the Purpose, the Customer(s) provides his/ her consent to share the information collected by the Krishak Sathi in part or full to the following:

| S.No | Entity | Purpose |
|------|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Dvara Solutions Private Limited (“Dvara Solutions”) | Dvara Registry and Dvara Solutions have entered into a partnership whereby Dvara E-Registry utilised the cloud solution developed by Dvara Solutions for the management of Credit Product by recording the information of the Customer(s). |
| 2. | Equifax Credit Information Services Private Limited | To avail the credit history of the Customer(s) |
| 3. | Grey Swift Private Limited | To execute the loan agreement between the Lender Partner and the Customer |
| 4. | ProteaneGov Technologies Ltd. | To execute the loan agreement between the Lender Partner and the Customer |

3. Any information collected by Dvara E-Registry from the Customer(s) through the Krishak Sathi shall only be stored by Dvara in servers located in India, in compliance with applicable Laws.
4. Customer(s) shall have the right to revoke consent given for the collection, use, storage, and/ or disclosure to any third-party of any or all information collected at any time by writing to/ contacting our Grievance Officer. Additionally, the Customer(s) shall also have the right to have their information deleted from the records of Dvara E-Registry by writing to/ contacting our Grievance Officer.
5. Dvara E-Registry may receive information about the Customer(s) from other sources, add it to the record maintained by it and treat it in accordance with this Privacy Policy.
6. Dvara E-Registry takes utmost care of Customer’s Personal Information and/or Sensitive Personal information and it shares such information with its employees and third- party facilities providers on a strictly “need to know” basis. Hence, Dvara E-Registry takes all

such steps to ensure that electronic records are valid under the Information Technology Act, 2000 as amended from time to time and notifications and rules framed thereunder.

7. Dvara E-Registry may share the sensitive Personal Information to any third party/Service Provider/Alliance Partner without obtaining the prior consent of the Customer(s) in the following limited circumstances:
 - i. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences.
 - ii. Dvara E-Registry proposes to share such information within its group companies and officers and employees of such group companies and/or third party service provider for the purpose of processing Personal Information on its behalf.
 - iii. Dvara E-Registry may use third-party advertising companies and/or within group companies to serve ads when the Customer(s)'s visits the Website. These companies may use Personal Information about the Customer(s)'s visit to the Website and other websites in order to provide advertisements about goods and services of interest to the Customer(s).
 - iv. Dvara shall transfer information about the Customer(s) in case Dvara is acquired by or merged with another Dvara.
 - v. Dvara may share the personal information with the Service Provider, in case the Customer(s) shows interest in Applying for Customer(s).
8. As Per PMLA (Prevention of Money Laundering Act 2002) guidelines and Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 records need to be maintained for a period of up to 10 years from the closer / deletion of account. In the event of any legal / regulatory proceeding is pending we can retain records for a longer period as may be asked by regulatory / statutory authorities.
9. Dvara E-Registry takes appropriate security measures in compliance with Applicable Law to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. In the event, any of your data breach occurs on account of our negligence, actions or omissions, Dvara E-Registry shall intimate the Customer(s) within a reasonable time.

THE DATABASE IS STORED ON SERVERS SECURED BEHIND A FIREWALL; ACCESS TO THE SERVERS IS PASSWORD-PROTECTED AND IS STRICTLY LIMITED. HOWEVER, AS EFFECTIVE AS OUR SECURITY MEASURES ARE, NO SECURITY SYSTEM IS IMPENETRABLE. WE CANNOT GUARANTEE THE SECURITY OF OUR DATABASE, NOR CAN WE GUARANTEE THAT INFORMATION YOU SUPPLY WILL NOT BE INTERCEPTED WHILE BEING TRANSMITTED TO US OVER THE INTERNET. AND, OF COURSE, ANY INFORMATION YOU INCLUDE IN A POSTING TO THE DISCUSSION AREAS IS AVAILABLE TO ANYONE WITH INTERNET ACCESS.

10. Modifications

Dvara E-Registry may revise these terms at any time. Please check this page available on our website from time to time to take notice of any changes we made. In the event you continue to use our services and/ or browse our Website, you consent to be bound by the modifications as well.

11. Grievance Redressal

In the event of any complaints, abuse or concerns with regards to content and or comment or breach of these terms, you may reach out to Dvara E-Registry's representative below at any time between 10.00 am and 6.00 pm Monday to Friday except public holidays.

i. Grievance Redressal Officer

Customer(s) are requested to address all their grievances at the first instance to the Grievance Redressal Officer. The contact details of the Grievance Redressal Officer are as provided below:

Name: Krishna Sravanthi P.

Address: Dvara E-Registry | Ground Floor, DSL Abacus IT Park, Uppal, Secunderabad, Hyderabad, Telangana 500039

Contact number: +91 7416189819

Email ID: krishna.sravanthi@dvara.com

ii. Nodal Officer

If the Customer(s) does not receive a response from the Grievance Redressal Officer within 15 days of making a representation, or if the Customer(s) is not satisfied with the response received from the Grievance Redressal Officer, the Customer(s) may reach the Nodal Officer on the toll-free number below anytime between 10:00am and 6:00 pm on weekdays except public holidays or write to the Nodal Officer at the e-mail address below. The contact details of our Nodal Officer are provided below:

Name: Senthilkumar S

Designation: Co Founder & Head-Agronomy & Administration

Address: Dvara E-Registry | Ground Floor, DSL Abacus IT Park, Uppal, Secunderabad, Hyderabad, Telangana 500039

Contact number: +91 8754511844

Email ID: senthilkumar.s@dvara.com

12. Recordal of Consent

Customer(s) shall accord his/ her consent to the terms mentioned under this Privacy Policy by providing the OTP generated to his/ her mobile number to the Krishak Sathi collecting his/ her information.