



PRIVACY POLICY

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1. INTRODUCTION

Tenmark Capital Private Limited ("**Company**", "**Tenmark**", "**we**", "**us**", "**our**" or "**TCPL**") is a Non-Deposit taking Non-Banking Financial Company ("**NBFC-ND**") registered with the Reserve Bank of India ("**RBI**"). The privacy policy ("**TCPL Privacy Policy**" or "**Policy**") explains how TCPL, and other partner banks and financial institutions ("**Co-Lending Partner**") collect, store, use, transfer and otherwise process your personal data, in connection with or related to providing you the TCPL services.

By using our website/application and by availing various products/services of TCPL, User consents to the terms of this Privacy policy ("**Privacy Policy**") in addition to the terms of use of mobile application, website and product documents. We encourage User to read this Privacy Policy regarding the collection, use, and disclosure of information by User from time to time to keep itself updated with the changes & updated that we make to this Policy.

Any customer who using the services offered by TCPL are expected to comply with the Privacy policy. If you do not agree with any of the clauses included in this policy it is suggested to terminate the relationship with TCPL.

2. DEFINITIONS

- a) **Tenmark Capital Loan Services ("TCPL Loan Services")**: Retail Lending offered by Tenmark Capital Private Limited to the customers
- b) **Customer** means a person, who is engaged in a financial transaction or activity with Tenmark and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting.
- c) **Officially Valid Documents ("OVD")**: "Officially Valid Document" (OVD) means the passport, the driving licence, proof of possession of Aadhaar number, the Voter's Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an officer of the State Government and letter issued by the National Population Register containing details of name and address.
Provided that,
 - where the customer submits his proof of possession of Aadhaar number as an OVD, he may submit it in such form as are issued by the Unique Identification Authority of India.





- where the OVD furnished by the customer does not have updated address, the following documents or the equivalent e-documents thereof shall be deemed to be OVDs for the limited purpose of proof of address:-
 - i. utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill);
 - ii. property or Municipal tax receipt;
 - iii. pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, if they contain the address;
 - iv. letter of allotment of accommodation from employer issued by State Government or Central Government Departments, statutory or regulatory bodies, public sector undertakings, scheduled commercial banks, financial institutions and listed companies and leave and licence agreements with such employers allotting official accommodation;
- the customer shall submit OVD with current address within a period of three months of submitting the documents specified above
- where the OVD presented by a foreign national does not contain the details of address, in such case the documents issued by the Government departments of foreign jurisdictions and letter issued by the Foreign Embassy or Mission in India shall be accepted as proof of address.

Explanation: For the purpose of this clause, a document shall be deemed to be an OVD even if there is a change in the name subsequent to its issuance provided it is supported by a marriage certificate issued by the State Government or Gazette notification, indicating such a change of name.

- d) Lending partners:** Banks and financial institutions that collaborate with TCPL to provide loan services including Gold Loans and Personal Loans. The current list of Lending Partners can be found on our website www.tenmarkcapital.com.



**3. WHO IS COVERED UNDER THIS PRIVACY POLICY?**

This policy is applicable to all the customers, prospect customers and persons ("User") who visit the office/branch and/or any 'Digital Property' belonging to TCPL or Digital property of any service providers in agreement with TCPL.

4. WHAT DATA IS COLLECTED AND HOW IT IS USED?

We and/or our Co-Lending Partner collect data to ensure that you are provided with the TCPL Loan Services, in the most customer friendly, and robust manner possible. We and/or our Co-Lending Partner use this data for the purposes identified in this Policy.

By accepting this Policy, you provide your explicit consent to us and/or our Co-Lending Partner collecting data about you, in the ways listed below:

(i) Data you provide to avail TCPL Loan Services

<i>Data Collected</i>	<i>What is data used for?</i>
<u>Personal Details:</u> We collect the data you provide to us when you apply for a loan on the platform, including your name, phone number, email ID, PAN, date of birth, and pin code. We may require you to share further information on a later date to confirm the veracity of the information or pursuant to any additional features added to the Website.	Enabling the Website and TCPL Loan Services; Loan Processing and KYC Authentication; Enabling services with Co-lender; enabling Customer Support; Research and Development; Enabling Communications Between You and Us; Marketing and Outreach; Automated Decisions; Legal Compliance and Requirements; Loan Servicing and Monitoring.
<u>Financial and KYC Information:</u> We and/ or our Co-Lending Partner(s) collect the data you provide when you accept the tentative terms of the loans. This includes your photograph, Aadhaar Number, PAN, parents' names, pin code, bank account number, IFSC, proof of address (which can be your electricity bill,	Enabling the Website and TCPL Loan Services; Loan Processing and KYC Authentication; Enabling and servicing of TCPL loan Services with our Co-Lending Partner; enabling Customer Support; Research and Development; Legal Compliance and Requirements; Enabling





rental/lease agreement, gas bill, passport or driver's license, or voter's identity card or any other officially valid documents(OVD) as per applicable law).	Communications between You and Us; Loan Servicing and Monitoring.
<u>Mobile Access:</u> We seek a one-time permission to access geolocation, microphone and camera from your mobile phone device.	Enabling the Website and TCPL Loan Services; Loan Processing and KYC Authentication; Enabling and servicing of TCPL Loan Services with our Co-Lending Partner; Legal Compliance and Requirements
<u>Economic Profile/ other data for processing loan:</u> We and/ or our Co-Lending Partner(s) may collect following financial data for processing loan application: Personal bank account details, Salary and income details, Bank account details such as cancelled cheque. This may include the past credit history, income details, bank statements, nature of employment, official employment email address and name of employer, employee provident fund details, monthly income, and marital status, goods and services tax returns	Enabling the Website and TCPL Loan Services; Loan Processing and KYC Authentication; Legal Compliance and Requirements; Enabling and servicing of TCPL Loan Services; Enabling Communications Between You and Us; Research and Development; Loan Servicing and Monitoring.
<u>Usage and Technical Information</u> We and/ or our Co-Lending Partner(s) may collect following technical information: IP addresses, application type, versions, configurations, device brand, device model, time zone setting, unique identifiers associated to your device, dates and times that you visit on the application and paths taken for the purpose of onboarding.	Enabling TCPL loan services; KYC Authentication; Enabling communications between you and us; Legal Compliance and requirements; Maintaining and managing user account; Loan servicing and monitoring





(ii) Data we collect from your usage of the TCPL Loan Services:

<i>Data Collected</i>	<i>What is the Data used for?</i>
<u>Transaction information</u> We and/or our Co-Lending Partner collect transaction information related to the use of TCPL Loan Services, including the type of TCPL Loan Services requested, date and time the TCPL Loan Services were provided, loan availed, interest payable, EMI selected, and payment method.	Enabling TCPL Loan Services; Loan Processing and KYC Authentication; Legal Compliance and Requirements; Enabling and servicing of TCPL Loan Services; Research and Development; Loan Servicing and Monitoring.
<u>Usage Information</u> We collect data about how you interact with TCPL Loan Services and, or the Website. This includes data such as call recordings from your interaction with our customer support team or TCPL Loan recovery team, interaction patterns (such as screen actions, gestures: taps, scrolls) access dates and times, Website features or pages viewed, Website crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with the TCPL Loan Services and, or the Website. We may use cookies, cache pixels and similar technologies to receive and store certain types of usage data from you.	Enabling TCPL Loan Services; Improving customer experience; Technical troubleshooting; Research and Development; Legal Compliance and Requirements; Enabling communications between you and us; Loan servicing and monitoring.

(iii) Information received from other sources:

<i>Data Collected</i>	<i>What is the Data user for</i>
<u>Credit Information:</u> By availing TCPL Loan Services you hereby consent to us, and/or our Co-Lending Partner accessing your credit information from credit	Loan Processing and KYC Authentication; Underwriting and risk assessment; Determining loan eligibility and loan terms; Legal Compliance and Requirements.





information companies to make personalized product offerings to you.	
<u>Bank Statements:</u> By availing TCPL Loan Services, you hereby consent to us, and, or our Co-Lending Partner accessing your Bank Statements from Account Aggregators to make personalized product offerings to you.	Loan Processing and KYC Authentication; Underwriting and risk assessment; Determining loan eligibility and loan terms; Legal Compliance and Requirements.
<u>Third Parties</u> We may also be working closely with third parties (including, for example, credit information bureaus, business partners, partner banks, account aggregators and financial institutions, technical subcontractors, analytics providers, search information providers and valuers) and may lawfully receive information about you from such sources.	Loan Processing and KYC Authentication; Legal Compliance and Requirements; Enabling TCPL Loan Services; Research and Development; Loan Servicing and Monitoring.
<u>Testimonials:</u> We may also use the content you have shared publicly, including on third party platforms or applications, to promote TCPL Loan Services (including by quoting your content, reviews and/or recommendations, or displaying screenshots of your content, reviews and/or recommendations).	Marketing and Outreach; Research and Development.
<u>Affiliates</u> To allow you a seamless experience on the Website, and avoid asking you to re-enter your information, we may, with your consent, collect your information from our Affiliates, in accordance with their respective privacy policies and applicable laws. This may include data from any Lending Service Provider (LSP), for instance, your account	Enabling the Website and TCPL Loan Services; Loan Processing and KYC Authentication; Providing a seamless user experience; Research and Development; Marketing purposes.





data to autofill your details or financial SMS data, app data, etc., for underwriting. For more details about the information collected by our Affiliates, please refer to their respective Privacy Policies.	
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The personal information we collect or utilize while facilitating the credit facility is driven by necessity. We do not gather, read or share with third parties your personal information like biometric information, contact list and telephony functions, unless required and permitted under applicable laws. We won't hold onto your personal information longer than permissible under laws.

All the above collected data is housed within servers situated in India.

5. HOW IS COLLECTED DATA USED AND WHY IS THE DATA COLLECTED?

The data that is collected in accordance with Paragraph 4 of the Policy will be used in the manner detailed below:

Reason of Use	Manner of Use
For Enabling the Website and TCPL Loan Services	Includes data usage for: <ul style="list-style-type: none">• Creation and updating of Loan Account• Analyze loan eligibility and estimate loan terms• Track the disbursement and repayment of the loan• Enable features that allow you to add and remove bank accounts for your loan repayment and disbursements from time to time• to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.
For Loan Processing and KYC Authentication	Includes: <ul style="list-style-type: none">• Analyzing credit worthiness, Loan eligibility and terms of loan• Verification of KYC documents





	We will not be able to provide you with the requested loan(s) without processing such data. For this purpose, you give us the explicit consent to voluntarily submit KYC documents, including Aadhar related documents in the manner required by us and our Co-Lending
For Enabling customer support	We or our lending service providers use the information to provide customer support, including to resolve your concerns from the use of the TCPL Loan Services, and train customer service executives.
For Research and Development	We may use the data collected for research, analysis, and product development to improve the UI/UX experience - all of which will ultimately improve how you experience the Website. This also helps us develop automated actions to be triggered in certain events, such as to identify if photographs uploaded are not clear, occurrence of fraud, incorrect IFSC, etc.
For Enabling Communications Between You and Us	We may add features that enable communications between you, and Us, including through the Website or other channels like SMS, email, post, etc.
For Marketing and Outreach	We use your information to communicate with you about TCPL Loan Services, send you marketing communications, promotional materials and other information that may be of interest to you based on your preferences.
For Legal Compliance Requirements	We may use the data we collect to investigate or address claims or disputes relating to use of TCPL Loan Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries and also for reposting with Credit Bureaus.





For Loan Servicing and Monitoring	We and/or our lending service providers use the data collected from you to effectively track and service your loan and to enable collection efforts.
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Explicit consent for fetching KYC from CKYCR

Your voluntary explicit consent is required to fetch KYC (know Your Customer) details from the Central KYC Records Registry using the details provided by you. You are aware that your KYC details would be downloaded from the Central KYC Registry, solely for performing customer due diligence on you in order to process your loan application. You also declare that your data on the Central KYC Registry is updated and has not been subjected to any change, as on the date of making the loan application. You further grant us explicit consent to validate, process, upload and/ or share your KYC details and other legally mandated information with the Central KYC records Registry, or any other regulated entities, financial institutions. Further, you hereby grant us your explicit consent to collect, store and use your Aadhaar number for the purpose of KYC verification

6. HOW DO WE SHARE THE COLLECTED INFORMATION?

We are very protective about your data. We may share your data with third parties for the following purposes:

Party	Purpose of sharing
Orocorp technologies Private Limited (OTPL)	Developing and maintaining tech systems Availing cyber security Availing data and analytics services Updation/enhancement of services or products owned, developed and provided to TCPL
Third Parties listed in Annexure A	<ul style="list-style-type: none">Validating and authenticating the official verification documents provided by you.E-signing of loan document or Sanction letterIntegrating of payment gatewayFor enabling collection efforts





	<ul style="list-style-type: none">• For fetching C-KYC data through CERSAI CKYCR and uploading data to portal• For Fetching details from Digilocker during KYC verification.• For Mandate Registration, Presentation, for• Debt Recovery• For Fetching EPFO, and GST details and PAN Details for PAN verification.• For accessing Bureau Data.
Lending Partners (As per list updated on the Website from time to time)	We work with identified banks and financial institutions to provide TCPL Loan Services on the Website, and we may share your information with such Lending Partner(s). The Website is the digital lending application facilitating the loan transactions between us, customers and the Lending Partners.
Government and Regulatory Agencies	If any governmental authority or law enforcement officers request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process, we, or our Co-Lending Partner may share such required information with the governmental authority or law enforcement officers

7. EMAIL/SMS/TELEPHONIC COMMUNICATIONS

If you opted-in to receive information about our services, updates and offers, we will use your name and e-mail address to send the information to you. If you no longer wish to receive these communications, you can unsubscribe by as mentioned in Paragraph 8.

Please note that we may send transactional and relationship messages, even if you have unsubscribed from our marketing communications. For instance, if our services are going to be temporarily suspended for maintenance, we may send you an email or SMS for updating on the same

8. CUSTOMER RIGHTS

TCPL Strive to offer adequate support to address request from you concerning the processing of your personal information and the customer has the right to modify and revoke the consent to processing of personal information. In line with applicable laws, you may have following rights:





- a) **Access to information:** You may request a record of our personal information that we process, upon verification of your identity, access will be provided as per our policy
- b) **Withdrawing or refusing your consent:** You can access and review the information shared by you by getting in touch with us. You can also withdraw or revoke consent given to us to process any information given by you, after fulfilling the pending contractual obligations, by writing to us at help@tenmarkcapital.com. Also you can request deletion of your account/information provided through platform/branch(s) after fulfilling the pending contractual obligations.

Please note that the company continues to retain certain information to comply with Applicable Laws. Withdrawal of consent may also impact, serviceability/availability of certain products or services being provided to you at the time.

- c) **Rectification of data:** In the event that any personal information provided by you is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data. It may take up to 10 days to process your request. We urge you to ensure that you always provide us with accurate and correct information/data to ensure your use of loan Services is uninterrupted
- d) **Right to opt-out:** You can opt out of receiving push notifications through web notifications and your device settings.
- e) **Request deletion:** You can request us to delete your account by forwarding a request to help@tenmarkcapital.com. The request will be processed subject to the condition that:
 - a. You do not have an on-going Credit facility with TCPL
 - b. There are no unresolved or probable grievances regarding your previous engagements with us or our representatives

Any of the above rights can be exercised by customers. However, certain situations might restrict these rights, for instance where we are legally obligated to process or retain your personal information.

9. CONSENT MECHANISM

Your consent is expressed to us processing of your data, including personal information, in accordance with this Policy, by checking the check box presented during the onboarding of customer. To take your prior and explicit consent, we will provide you with appropriate options within the Website or app, to give or deny the consent for the use of data, to permit disclosures to third parties, to retain data, etc, as per the applicable law. We will also disclose the purpose of obtaining your consent at appropriate stages of interface within the Website/App. By providing your explicit consent, you agree to the processing, storage, usage, and sharing of the data provided by you pursuant to this Policy.





If you wish to revoke any consent you have provided to us, customer may follow procedure as mentioned in Paragraph 8.

We will make every effort to inform you of the data attributes that are necessary to be retained by us under applicable laws or for our underwriting checks, fraud detection and prevention, reporting purposes or dispute management.

10. DATA RETENTION

Consistent with the principles outlined in this Policy, TCPL will retain personal information for the duration necessary to achieve the objectives for which the details are collected and to the extent permissible under law. Information may be retained for an extended period (i) in case of requirement of any investigations under law or as part of any requirement before courts/Tribunals/Forums/Commissions etc and (ii) to enhance / improve the products /services of TCPL.

11. GRIEVANCE REDRESSAL

For any grievances redressal, users/customers may note the redressal process under the Grievance Redressal policy available in www.tenmarkcapital.com.

12. MISCELLANEOUS

- Our application may include links to other websites or online services, whose privacy practices may differ from our policy. If you put information to any of these websites or online services, your information is governed by their policy and TCPL shall not be liable for the same.
- The customer is responsible for maintaining the secrecy and accuracy of your password, email address, and other account information at all times. We recommend a string password that you do not use with other services. We are not responsible for your personal information transmitted to third party.

13. UPDATE OF POLICY

We may occasionally update this Policy. Use of TCPL Loan Services after an update constitutes consent to the updated notice to the extent permitted by law. Please take the time to periodically review this Policy for the latest information on our privacy practices.





ANNEXURE A- Third parties

<u>Third Party</u>	<u>Purpose</u>
Digilocker	For Accessing KYC documents
CERSAI	For CKYCR verification and reporting
NSDL	For PAN Verification
Experian/ Equifax	For fetching credit information
Razorpay	Payment gateway
	E-signing providers

