



Policy on Confidentiality of Client Data



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Release Authorization

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Board Approval Authorization

Name	Title	Signature	Date
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Introduction

The website <https://www.swarafincare.com> ("Website") is owned and operated by Swara Fincare Limited. Swara is committed to serve you better as our customers/user and we respect your right to privacy.

The company may collect, store, access and use personal information solely to the extent required for the company for accessing credibility of customers for the purpose of Swara services.

Swara Fincare Limited shall not sell, publish, give on rent, trade or otherwise transfer personal information to third party's customer's personal details to anyone. Swara will protect every bit of the customer's business or personal information and maintain the confidentiality of the same.

This client data security policy is designed to about our practices regarding collection, use and disclosure of information that you may provide via site or app.

Purpose of the Policy

Swara Fincare is strongly committed to protecting the privacy of its clients' data. The purpose of this Policy is to identify information that is considered confidential and to establish the Principles and Guidelines on the access, maintenance and handling of such confidential information. The company is expected to take all necessary and reasonable measures to protect the confidentiality of client information in line with this policy.

Data Collection and Processing

At the point of collection of any data, borrowers must be made aware of the fact that their data is being collected, the purpose for which the data is collected, the intended recipients of the data etc. Further, all data is subject to a restriction on any processing for secondary purposes. It must be processed only for the purpose for which it was collected or any reasonable purpose for which it has been authorized by the management.

When a loan application is being collected, it should be informed to the customer that this information will be kept confidential, but it would be used by the company for purposes mentioned below. Client information may be disclosed to a third party subject to the following conditions:

1. Client has been informed about such disclosure and permission has been obtained in writing.
2. It is legally required to do so.
3. This practice is customary amongst financial institutions and available for a close group on reciprocal basis (such as a credit bureau).

The data sharing commitments of the company includes –

- To share complete client data with all RBI approved Credit Bureaus/ Credit information Companies, as per the frequency of data submission prescribed by the Credit Bureaus.
- To share data as desired for the purpose of audits/ inspection/ due diligence by statutory and concurrent auditors of the company either appointed by company or an external authority authorised by company to do so/ or its lenders and investors and regulators (e.g., RBI).

Use of collected Personal Information

Swara Fincare Limited may use the personal information that is collected from clients to provide requested products and services and for our internal business purposes, including but not limited to:

- To provide products or services clients have requested.
- To provide information to our partners to assist in making credit decisions about the clients.
- Search credit bureaus, generate credit reports and fraud prevention purposes.
- To process client transactions and to provide post transactions related services.
- Maintaining and managing client accounts with us.
- To carry out process review and audits under regulatory framework.
- Performing other functions as described to clients at the time of collection of personal information or pursuant to clients' consent.

Data Retention and Deletion

We at Swara Fincare, promise to protect clients personal data from unauthorised access, misuse and disclosure using the right security measures based on the type of data and how we are processing the same. We retain information about clients to provide a seamless experience, to contact you in case of support required and about your account, to detect, mitigate, prevent and investigate fraudulent or illegal activities during the course of the services. We retain client's data for as long as necessary based on statutory requirements and to provide clients with our services.

Confidentiality

Swara Fincare will protect customer personal information against unauthorized use, dissemination or publication in the same manner in which it would protect its confidential information of similar nature. However, under certain conditions Swara Fincare may share or use this information, for the following purposes:

- In the course of the delivery of services and in the course of normal business operations; or
- With the consent of the client, the client's Parent, Guardian or Attorney; or
- As may be requested by Statutory Authorities or as permitted by law; or
- To keep customers updated about new products or other information.

Responsibilities of Departments Heads and Authorized users of Confidential Information

Department Heads and authorised users are responsible for establishing and maintaining security for confidential information within their areas of responsibility consistent with this Policy including the following:

- Require that only authorized users have access to confidential information and that he/she understands this Policy and his/her responsibilities in the handling of such information and materials.
- Identify confidential information and materials and implementing adequate controls to secure confidential data and information.
- Protect against the unauthorized disclosure of confidential information.

Enforcement

Anyone who knowingly disseminates confidential data or noncompliance of this Policy may result in serious disciplinary action, including suspension or termination of employment. This policy shall be periodically reviewed by the Managing Director.