



**Privacy Policy of  
Aashiyana Financiers Services Private Limited  
(Erstwhile Thrivenest Advisors Private Limited)**



## 1. INTRODUCTION

Welcome to Aashiyana Financiers Services Private Limited with domain name <https://aashiyanafin.com/> (hereinafter referred to as "Website"), incorporate under the Companies Act, 2013 and is primarily engaged in the business of financial services having its Registered Office and Corporate Office in Jaipur (Rajasthan). We, at Aashiyana Financiers are strongly committed to protect the personal and financial information that the customer submits to us and would endeavour to protect it from unauthorised use. Use of this Website signifies your acknowledgement and consent to this Privacy Policy. If, however, you object to Your Information being used, processed and transferred by Aashiyana Financiers in any way, please do not share your information on the Website.

## 2. TYPE OF PERSONAL INFORMATION COLLECTED

Aashiyana Financiers may for the purpose of rendering its services, collect personal information as described below:

### Information that may be provided by you directly, such as:

- a. Identification Information: Name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information.
- b. PAN, KYC Status, Signature and Photograph.
- c. Bank account or other payment instrument details.
- d. Any other detail, which may be required by us for providing services.

### Information that we may collect from your use of our services for lending partners, such as:

- a. **Transaction Information:** We read, collect and monitor, subject to lending partner's LOS capabilities, only financial transactional SMS for description of the transactions and the corresponding amounts for credit risk assessment. Other SMS data is not accessed.
- b. **Storage Information:** We may facilitate user to download and display information such as scheme commission details which a user may refer to, or to upload relevant documents as per various processes during user account management or transaction order placement.
- c. **Media Information:** We facilitate users to capture / upload relevant documents as may be required to be uploaded during user account management or transaction order placement.
- d. **Device Information:** We collect specific information about your device when you access our Services, including your storage, hardware model, operating system and version, unique device identifier, mobile network information, and information about the device's interaction with our services.
- e. Subject to capabilities of lending partner's LOS system, we also collect the personal data including Aadhaar number/Virtual ID, directly from the Aadhaar number holder for conducting authentication

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with UIDAI at the time of providing the services. IT will be collected for the purpose of authentication of Aadhaar number holder to provide services of e-KYC for customer on boarding and loan disbursement.

### Key Data Privacy Principles

The Policy represents the minimum standards that Aashiyana Financiers has set with respect to data privacy. It aligns with (and in some cases exceeds) the requirements of applicable laws and regulations (i.e. Indian IT Act of 2000, IT Amendment Act of 2008, IT Rules of 2011 and Aadhaar Act 2016).

SPI refers to Sensitive personal data or information of a person means such personal information which consists of information relating to; —

1. Password;
2. Physical, physiological and mental health condition;
3. Sexual orientation;
4. Medical records and history;
5. Aadhaar Number Holder
6. Any detail relating to the above clauses as provided to Aashiyana Financiers for providing service;

Any of the information received under above clauses by Aashiyana Financiers for processing, stored or processed under lawful contract or otherwise provided that, any information that is freely available or accessible in 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 data or information for the purposes of these rules.

**A. Collection Limitation:** Personal Data shall be collected by fair, lawful and transparent means. Aashiyana Financiers shall be open with individuals about how the Company will use their Personal Data, with whom it shares and where it may be sent-

1. Consent shall be taken in writing through the application form/ agreement or any other documents executed or through letter or email from the provider of the sensitive personal data or information regarding purpose of usage shall be obtained before collection of such information.
2. While collecting the information directly from the concerned person, it shall be ensured that the provider of information is aware of the following aspects:
  - a. The fact that information is collected
  - b. The purpose for collecting information
  - c. The intended recipients of the information
3. Prior to the collection of information including sensitive personal data or information, an option shall be provided to the provider of the information not to provide the data or information sought to be collected.

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4. Lending partner of Aashiyana Financiers shall also use the collected the personal data including Aadhaar number/Virtual ID, directly from the Aadhaar number holder for conducting authentication with UIDAI at the time of providing the services;

**B. Data Minimization:** Only the Sensitive Personal Data required for authorized business activities shall be collected from the provider. Personal Data shall not be made available to anyone (including internal staff) who are not authorized, or do not have a business 'need to know' the information

**C. Disclosure:** The Personal Information (including sensitive personal data or information) collected or stored by lending partner, shall be available for view by any third party by an order under the law for the time being in force and the providers of information who provided information under lawful contract. The summary of this policy shall be published on Aashiyana Financiers website and shall provide for—

1. Clear and easily accessible statements of its practices and policies;
2. Type of personal or sensitive personal data or information collected;
3. Purpose of collection and usage of such information;
4. Disclosure of information including sensitive personal data or information; and
5. Reasonable security practices and procedures for protection of PII / SPI

Aadhaar number holder shall be notified of the authentication either through the e-mail or phone or SMS at the time of authentication and the lending partner shall maintain logs of the same.

**D. Use Limitation:** The Personal Information shall be used for the purpose for which it has been collected. The privacy risks shall be taken into consideration, before the collection, use, retention or disclosure of Personal Information, such as in a new system or as part of a project.

**E. Security:** There shall be adequate protection for the Personal Data collected, used, retained and disclosed to support our business activities by following the relevant usage, technical and organizational policies, standards and processes.

**F. Access, Correction and Update:** Processes shall be defined to enable the providers of information, as and when requested by them, to review the information they had provided and ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible. Aashiyana Financiers shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by the provider of information except in cases where the Company has the mechanism to verify the information submitted by customers.

**G. Retention:** Personal Data shall be retained in accordance with the Preservation of Records policy, to support a specific business activity or legal/ regulatory/ statutory requirement. The person who has collected the information shall not retain the information for longer than is required for usage as per requirement or law.

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Lending partner shall store Aadhaar authentication transaction logs for two years, subsequent to which the logs shall be archived for five years, and shall be deleted after expiry of the said period, except for court orders or pending disputes.

Aashiyana Financiers may transfer SPI to any other entity or person located in India or any other country that ensures the same level of data protection through defined controls. Transfer of information shall be allowed only if it's necessary as per the contracts and the information provider has consented to it.

**H. Third Parties:** It shall be ensured that access to and transfers of Personal Data (in email body or as attachments) to third parties are carried out only if it is necessary for the performance of the lawful contract between Aashiyana Financiers or any person on its behalf and provider of information or where such person has consented to data transfer and with suitable contractual protections. Due diligence activities shall be conducted to ensure that the third party has appropriate security & privacy controls in place prior to sharing of any SPI data.

**I. Marketing and Promotional Activities:** Marketing and promotional communications shall be sent to providers of information / customers only after obtaining required consent from them.

### 3. LOG FILE INFORMATION, WHICH SHALL BE STORED AUTOMATICALLY:

If you visit/ log into our website just to browse, read pages or download information, certain information regarding your visit is automatically stored on our systems. This information cannot and does not identify you personally.

The kind of information that is gathered automatically include without limitation:

- a. The type of browser you are using (e.g. Internet Explorer, Firefox, etc.).
- b. The type of Operating System you are using (e.g. Windows or Mac OS).
- c. The domain name of your Internet Service Provider, the date and time of your visit and the pages on our website.

We sometimes use this information to improve our website(s) design, and content primarily to give you a better browsing experience. This Policy is not intended to and does not create any contractual or other legal rights in favour of any user or viewer of our website or on behalf of any other party.

### 4. PURPOSE OF COLLECTION AND USAGE OF INFORMATION

On our site we collect, retain, and use information about you only when we reasonably believe that it will help administer our business or provide products, services, and other opportunities to you. Such information is collected for specified business purposes, such as:

- ✓ To provide you with the services that might be required by you.
- ✓ To process your financial and non-financial transaction requests.
- ✓ To undertake research and analytics for offering or improving our services.

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- ✓ To check and process your applications which may be submitted for availing any financial services.
- ✓ To share with you any updates/changes to the services and their terms and conditions.
- ✓ To take up and investigate any complaints/claims/disputes.
- ✓ To respond to your queries and feedback submitted by you.
- ✓ For verification of your identity and other parameters.
- ✓ To fulfil the requirements of applicable laws / regulations and / or court orders / regulatory directives received by us.

## 5. DISCLOSURE OF INFORMATION

**The information provided by you may be disclosed to:**

1. Regulatory Authorities.
2. Another business entity having business arrangement or lending service agreement or business correspondent agreement in writing with Aashiyana Financiers.
3. Any judicial or regulatory body.
4. Auditors
5. Other third-party service providers.

**We shall not publish the sensitive personal data or information or disclose it further, without your consent, for any purpose other than stated above.**

### **Retention of Information**

Aashiyana Financiers shall not retain or store such information except when the information may lawfully be used or is otherwise required under any other law for the time being in force.

By agreeing to avail the services offered by Aashiyana Financiers, you have agreed to the collection and use of your Sensitive Personal Data or Information, as well, by Aashiyana Financiers. You always have the right to refuse or withdraw your consent to share/disseminate your Sensitive Personal Data or Information by contacting the customer care.

However, in the event of your refusal or withdrawal of personal data, you shall not be able to avail any services of Aashiyana Financiers to the fullest extent.

### **Communications & Notifications**

When You use the Website or send emails or other data, information or communication to us, you agree and understand that you are communicating with us through electronic mode and your consent to receive communications from us periodically. We may send notifications to you via email or in writing as a hard copy notice, or through conspicuous posting of such notice on our website page.

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## 6. REASONABLE SECURITY PRACTICES FOR PROTECTING YOUR INFORMATION

Aashiyana Financiers uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information.

### Links to Other Web Sites

Please note that this Privacy Policy does not extend to third party sites linked to this website. Aashiyana Financiers is not responsible for the content and the privacy practices of such linked websites. It is advisable to read each such linked website's privacy statement prior to sharing any information.

### Changes to Our Privacy Policy

Please note that this policy may change from time to time. If We change our privacy policies and procedures, we will post the changes on the Website to keep You updated.



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