



Altum Credo Home Finance Private Limited
Privacy Policy
Version- 1.1

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Altum Credo Home Finance Private Limited

CTS NO 1074/1 Plot NO -426,426/1 Gokhale Road, Model Colony, Shivaji Nagar, Pune, Maharashtra -411016



Document Control

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Purpose

At Altum Credo Home Finance Private Limited (hereinafter referred to as “**Altum Credo**”, “**we**”, “**us**”, the “**Company**”), a company incorporated under the provisions of Companies Act, 2013, having our registered office at Lodha Capital, CTS No. 1074/1, Plot No. 426/1, Gokhale Road, Model Colony, Shivajinagar, Pune - 411016 and having corporate identity number U65999PN2016PTC166384, we value your trust and respect your right to privacy.

This Privacy Policy provides you with details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. If you do not agree to the terms of this Privacy Policy, please do not further use or access Altum Credo website or Altum Credo applications.

This policy (the “**Data Protection and Privacy Policy**”) explains which personal data concerning you we collect when you visit our website (the “**Website**”), when and why we collect the personal data, how we use them, the conditions of our disclosure to third parties, as well as how we secured the stored personal data.

General

This privacy statement is applicable to website and applications (mobile and hybrid, hereinafter referred to “applications”) of Altum Credo. This Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, or television or any other media or computer resource to access our Services. It also applies to those who register on our website/applications in connection with use of our services, or whose data Altum Credo otherwise receives in connection with its services. It is important that you read the Privacy Policy carefully because whenever you use our website/applications, your personal data will be processed (if at all) in accordance with this policy.

This Policy also describes how Altum Credo may collect, use and share any information (“Information”) you provide, including Information collected by the Altum Credo’s server from your browser, when you visit this Website, receive our emails, or phone call, interact with advertisements we have on any third-party websites. Further, by registering yourself at the Website, you authorize Altum Credo to contact you in order to communicate details of the services you have consented to receive, provide details of programmes and schemes, offering promotional offers running on the Website & offers offered by the associated third parties.

Personal Data and its collection

Personal Data, means and includes, any data relating to identified or identifiable living person (‘data subject’ here in referred as you/your’) including but not limited to name, address, mailing address, telephone number, email ID, medical records and history, biometric information, bank account details including details linked to credit/debit payment instruments, information about your mobile phone any personal details that may have been voluntarily provided by the customer, whether to Unique Identification Authority of India (UIDAI), Credit



Information Bureau of India Limited (CIBIL) or any other agency including any other Credit Information Companies (CIC).

Information Collected

Altum Credo does not collect personal data about individuals except when such individuals specifically provide such data on a voluntary basis. Upon such voluntary disclosure of personal data, we may further verify, collate or receive data about you from publicly and commercially available sources (as permitted by law), which we may combine with other data we receive from you. We may also receive data about you from third-party social networking services if you are already connected with those services.

By using the Website, you agree to the collection and use of information in accordance with this policy. In order to operate the Website and provide you with details on services, facilities and programmes that may be of interest to you, we may collect Information but not limited to postal address, phone number, email address computer's unique Internet Protocol address, credit and debit card numbers, your contacts, images uploaded by you on our app/website, bank and other account numbers, passwords, PIN code, home town, gender, age, website cookies and website usage data from you. These details are collected by us and stored on our servers, we may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("**Usage Data**").

We may receive and process information about your location. For example, with your consent, we may collect information about the specific location of your mobile device (for example, by using GPS or Bluetooth). We may also receive location information from you when you choose to share such information on our Services, including by associating your content with a location, or we may derive your approximate location from other information about you, including your IP address.

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Use of Information / Personal Data

We use the Information / Personal Data to provide you with loan you explicitly requested for, to resolve disputes, troubleshoot concerns, help promote safe services, assess your interest in our services, inform you about offers, products, services, updates, customize your experience, detect, and protect us against errors, fraud and other criminal activity, enforce our terms and conditions, etc.



We may also use your Personal Data to send you offers regarding various services/facilities which Altum Credo may, from time to time, launch. Your consent will be taken before we send you any such communication.

We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, gender, etc.). We use this data to customize your experience at Altum Credo. Since the surveys will be optional, any personal data you provide will be voluntarily given by you. All such data shall be transmitted and stored by us in an encrypted manner in accordance with all applicable laws to ensure the secrecy and confidentiality of the personal data and such personal data shall not be shared or used except as contemplated herein.

Transfer of Data

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. We will impose contractual duties on the transferee, enabling the transferee to conform with the terms of this Privacy Policy.

If you are located outside India and choose to provide information to us, please note that we transfer the data, including Personal Data, to India and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

In the course of day-to-day business operations, authorized individuals within the Company may from time-to-time utilize and / or transfer Personal Data among various Company locations. These transfers of Personal Data are necessary in order to carry out the Company's General Business Purposes. Specifically, Personal Data may be used as follows:

- To identify a Data Subject personally;
- To communicate with a Data Subject;
- To manage the business;
- To comply with human resource requirements;
- To comply with government regulations;
- To provide associate benefits;

Disclosure of Data

Altum Credo may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Altum Credo
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public



- To protect against legal liability

Data Retention

Your personal data processed by Altum Credo are kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed in line with legal, regulatory, contractual or statutory obligations as applicable.

At the expiry of such periods, your personal data will be deleted or archived to comply with legal/contractual retention obligations or in accordance with applicable statutory limitation periods.

Control over Your Information

We also provide you with the ability to control your Personal Data in accordance with applicable laws. You have the ability to update your profile and related Personal Data at any time.

An option will be provided to you to give your consent confirming that you understand that certain personal information will be collected by us and you agree to the processing of your Personal Data to enable us to provide you with our services. At times, express written consent from you may be required based on the data processing activity. All Personal information so provided will be on an 'as on' basis and Company shall not be responsible for the authenticity of the personal information supplied by you.

Also, you may review, update, correct, delete or object your Personal Data collected through the website/applications or service by e-mailing us at customercare@altumcredo.com. Further, even after earlier providing personal information, you can withdraw from further usage of the personal data by writing to us on the abovementioned email id or to the Grievance Officer.

Security Precautions

Altum Credo always makes sure to implement reasonable security practices and procedures (such as managerial, operational, physical, and technical) for the purpose of protection and safeguarding of your personal data as the same is of vital importance to Altum Credo. At Altum Credo, we are strongly committed to protecting the personal and financial data that you submit to us.

Altum Credo shall ensure to safeguard the security and confidentiality of any data you share with us. Any of your personally identifiable data obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your Personal Data, Altum Credo cannot warrant the security of any data you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your Personal Data is done at your own risk.



Transactions on the Website are secure and protected. Any information entered by you when transacting on the Website is encrypted to protect you against unintentional disclosure to third parties. Your credit and debit card information is not received, stored by, or retained by the Company / Website in any manner. This information is supplied by you directly to the relevant payment gateway, which is authorized to handle the information provided, and is compliant with the regulations and requirements of various banks and institutions and payment franchisees that it is associated with.

Lastly, you are requested to help us protect your data privacy by maintaining the secrecy of the username and password, if any you use for any of our Services.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service.
- Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
- Security Cookies: We use Security Cookies for security purposes.

Altum Credo collects only such personal information that we believe to be relevant and would be required to understand you or your business's financial requirements. All information collected shall be used by Altum Credo for the sole purpose of providing you with the best possible customer products and services.

Altum Credo shall not sell, rent, or otherwise disburse information provided by you to a third party unless the same is required by Altum Credo to provide services to you, or to enable a transaction, credit reporting, required pursuant to applicable banking norms, law or pursuant to the terms and conditions applicable to such information as agreed to by you.

Altum Credo may share your contact information with its affiliates, staff or third parties with permitted access. However, all such affiliates, staff or third parties, who receive your information, shall be required to observe our confidentiality obligations.

Altum Credo may engage third-party advertising companies or advertising agencies to advertise on the Website. These companies may utilise information (excepting personal information) about your visits to the Websites and other websites in order to provide advertisements on the Website and other sites about services, facilities and programmes that



may be of interest to you. We may use third-party Service Providers to monitor and analyse the use of our Service.

The Website may contain links to third party websites that are not owned or controlled by Altum Credo. This Policy does not address how information is handled when provided to any third parties nor the policy of any other affiliate or third-party website that may be linked to from the Website.

From time to time, we may change this Privacy Policy. The effective date of this Policy, as stated below, indicates the last time this policy was revised or materially changed. Checking the effective date below allows you to determine whether there have been changes since the last time you reviewed the Policy.

Data Privacy Issues and Whom to Contact

If you have any questions, comments, or concerns about this Privacy Policy or about how we handle your Personal Data, please get in touch with us at customercare@altumcredo.com.

Any discrepancies and grievances related to the processing and use of your information can be raised to the Grievance Officer appointed by ACHF. For further details please visit <https://altumcredo.com/grievance-redressal-mechanism/>

Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.