PRIVACY POLICY

TABLE OF CONTENTS

1.	INTRODUCTION	2
2.	DEFINITIONS	2
3.	WHO IS COVERED UNDER THIS PRIVACY POLICY?	3
4.	WHAT DATA IS COLLECTED AND HOW IT IS USED?	3
5.	HOW IS COLLECTED DATA USED AND WHY IS DATA IS COLLECTED?	7
6.	HOW DO WE SHARE THE COLLECTED INFORMATION?	9
7.	EMAIL/SMS/TELEPHONIC COMMUNICATIONS	11
8.	CUSTOMER RIGHTS	11
9.	CONSENT MECHANISM	12
10.	DATA RETENTION	12
11.	GRIEVANCE REDRESSAL	12
12.	MISCELLANEOUS	13
13.	UPDATE OF POLICY	13

1. INTRODUCTION

Kumbhat Financial Services Limited ("**Company**", "**Kumbhat**", "**we**", "**us**","**our**" or "**KFSL**") is a Non-Deposit taking Non-Banking Financial Company ("**NBFC-ND**") registered with the Reserve Bank of India ("**RBI**").

The privacy policy ("**KFSL Privacy Policy**" or "**Policy**") explains how KFSKL collect, store, use, transfer and otherwise process your ("**User**") personal data, in connection with or related to providing you the KFSL services.

By using our website/application and by availing loans/services of KFSL, User consents to the terms of this 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.

A Lending Service Provider engaged by KFSL does not store any of your personal data other than the basic minimal data necessary for it to perform its function, and is contractually prohibited from using your data for any purpose of its own.

Any customer who uses the services offered by KFSL is expected to comply with the Policy. If you do not agree with any part of this Policy, or you wish to withdraw a consent you have given, this Policy sets out how you may withdraw consent, ask us to correct your data, ask us to delete it, and raise a complaint.

2. DEFINITIONS

a) **Kumbhat Financial Loan Services ("KFSL Loan Services")**: Retail Lending offered by Kumbhat Financial Services Limited to the customers

b) **Customer** means a person, who is engaged in a financial transaction or activity with Kumbhat 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" or "OVD" means a document specified as an officially valid document under the Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025, and includes the equivalent e-documents, and those documents which are deemed under those Directions to be officially valid documents for the limited purpose of proof of address

d) Website shall mean the website of the Company accessible at https://kumbhatfinancialserviceslimited.com/

3. WHO IS COVERED UNDER THIS PRIVACY POLICY?

This Policy is applicable to all the customers, prospective customers and persons ("User") who visit the office and/or any 'digital property' belonging to KFSL or digital property of any service providers who have an agreement with KFSL.

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

We collect data to ensure that you are provided with the KFSL Loan Services, in the most customer friendly, and robust manner possible. We use this data for the purposes identified in this Policy.

Your explicit consent is sought at each stage at which data is collected, and separately for each purpose described in this Policy.

By accepting this Policy, you provide your explicit consent to us collecting data about you, in the ways listed below:

(i) Data you provide to avail KFSL Loan Services

Data Collected	***What is data used for?***
Personal Details: 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 KFSL Loan Services; Loan Processing and KYC Authentication; 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.
Financial and KYC Information: We 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, rental/lease agreement, gas bill, passport or driver's license, or voter's identity card or any other	Enabling the Website and KFSL Loan Services; Loan Processing and KYC Authentication; enabling Customer Support; Research and Development; Legal Compliance and Requirements; Enabling Communications between You and Us; Loan Servicing and Monitoring.

officially valid documents(OVD) as per applicable law).	
Mobile Access: We seek a one-time permission to access geolocation, microphone and camera from your mobile phone device. Access is sought only at the point at which it is required and is not continuous. We do not access these resources in the background	Enabling the Website and KFSL Loan Services; Loan Processing and KYC Authentication; Legal Compliance and Requirements.
Economic Profile/ other data for processing loan: We 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 KFSL Loan Services; Loan Processing and KYC Authentication; Legal Compliance and Requirements; Enabling and servicing of KFSL Loan Services; Enabling Communications Between You and Us; Research and Development; Loan Servicing and Monitoring.
Usage and Technical Information We 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 KFSL 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 KFSL Loan Services:

Data Collected	***What is the Data used for?***
Transaction information We collect transaction information related to the use of KFSL Loan Services, including the type of KFSL Loan Services requested, date and time the KFSL Loan Services were provided, loan availed, interest payable, EMI selected, and payment method.	Enabling KFSL Loan Services; Loan Processing and KYC Authentication; Legal Compliance and Requirements; Enabling and servicing of KFSL Loan Services; Research and Development; Loan Servicing and Monitoring.
Usage Information We collect data about how you interact with KFSL Loan Services and, or the Website. This includes data such as call recordings from your interaction with our customer support team or KFSL 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 KFSL 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 KFSL 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:

Data Collected	***What is the Data user for***
Credit Information: By availing KFSL Loan Services you hereby consent to us, accessing your credit information from credit information companies 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.

Bank Statements: By availing KFSL Loan Services, you hereby consent to us, 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.
Third Parties 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 KFSL Loan Services; Research and Development; Loan Servicing and Monitoring.
Testimonials: We may also use the content you have shared publicly, including on third party platforms or applications, to promote KFSL 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.
Affiliates 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 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.	Enabling the Website and KFSL Loan Services; Loan Processing and KYC Authentication; Providing a seamless user experience; Research and Development; Marketing purposes.

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 do not access, read, collect, store or share your contact list, call logs, media files, photographs, documents or other files stored on your device, your SMS messages, or the telephony functions of your device, at any time or for any purpose.

We won't hold onto your personal information longer than permissible under applicable 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 KFSL Loan Services	Includes data usage for: ● 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: ● 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.
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 KFSL 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 KFSL 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 KFSL 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.

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. Where you choose to use Aadhaar offline verification, the identification and verification is carried out by offline verification with your consent, or by such other mode as is permitted under applicable laws. Your Aadhaar number is redacted so that only the last four digits are visible in the record we retain, and the full number is neither stored nor displayed in our systems.

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 KFSL
Third Parties listed in Annexure A	● Validating and authenticating the official verification documents provided by you. ● E-signing of loan document or Sanction letter ● Integrating of payment gateway ● For enabling collection efforts ● 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 KFSL Loan Services on the Website, and we may share your information with such Lending Partner(s).
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 may share such required information with the governmental authority or law enforcement officers
Recovery agents and collection agencies engaged by KFSL	For contacting you about overdue amounts, for collection of dues and, where applicable, for taking possession of security. Only such limited information as is necessary for that purpose is shared. The agency is bound by confidentiality obligations and by our Code of Conduct for recovery agents.

We are required under the Credit Information Companies (Regulation) Act, 2005 and the directions made under it to report information about your loan to every credit information company of which we are a member, namely TransUnion CIBIL, Experian, Equifax and CRIF High Mark. The information reported includes your identity and address details, your loan account, the amounts outstanding and your repayment conduct, including any default. This reporting is a statutory obligation, does not depend on your consent, and continues after your loan is closed.

Reporting is made at the intervals prescribed by the Reserve Bank of India. We also obtain your credit information report from these companies in order to assess your application and to monitor your loan. You will receive an alert by SMS or email each time we access your credit information report, and each time a default is reported by us.

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

KFSL shall strive to offer adequate support to address requests from you concerning the processing of your personal information and the you have the right to modify and revoke the consent to processing of personal information. In line with applicable laws, you have the following rights:

a) **Access to information:** You may request a record of your personal information that we process. The Company shall verify your identify before processing such request and upon verification of your identity, access will be provided as per our internal 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@kumbhatfinancialserviceslimited.com. Also, you can request deletion of your account/information provided through platform/branch after fulfilling the pending contractual obligations.

   Please note that the Company shall continue to retain certain information to comply with applicable laws. Withdrawal of consent may also impact serviceability/availment 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@kumbhatfinancialserviceslimited.com. The request will be processed subject to the condition that:
   a. You do not have an on-going credit facility with KFSL
   b. There are no unresolved or probable grievances regarding your previous engagements with us or our representatives
   c. we are not required to retain the data under applicable law

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

You provide your express consent to us for processing 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

We retain your personal data only for as long as is necessary for the purpose for which it was collected, or for such longer period as applicable law requires. Data no longer required for either reason is deleted or anonymised. The following minimum periods apply:

(a) records of identity and address and other customer due diligence records, and the account file and business correspondence relating to your loan — five years from the date on which the business relationship ends or the loan account is closed, whichever is later;

(b) records of transactions — five years from the date of the transaction;

(c) credit information reported to credit information companies — as required under the Credit Information Companies (Regulation) Act, 2005 and the directions made under it;

(e) records of the consents you have given — for so long as the consent is relied upon and for seven years afterwards;

(f) data retained for the establishment, exercise or defence of legal claims, or in connection with an investigation, proceeding or regulatory direction — until that matter is concluded and any applicable limitation period has expired.

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11. GRIEVANCE REDRESSAL

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

This Annexure sets out the third parties referred to in Paragraph 6 of this Policy. Part 1 lists the parties to whom the Company discloses personal data. Part 2 lists the parties that collect personal data directly from you within the Company's application or website. Sharing with Lending Partners and with governmental and regulatory authorities is dealt with separately in Paragraph 6 and is not repeated here.

In every case:

- The Company does not sell, rent, trade or otherwise monetise your personal data.
- No third party listed below uses your personal data for its own purposes. Each acts on the Company's instructions under a written agreement, except in respect of the data described in Part 2.
- Disclosure is limited to what is necessary for the purpose stated against each entity.
- The Company does not collect, receive or store your payment card credentials, UPI credentials, net-banking credentials or Aadhaar-based e-signature one-time passwords. Where such details are required, they are entered by you directly into the interface of the third party named in Part 2.

Part 1 – Parties to whom the Company discloses personal data (As on 15th September 2026)

Sr. No	Third Party	Role / Category	Purpose of Sharing	Personal Data Disclosed by KFSL
A. IDENTITY VERIFICATION AND KYC				
1	**DigiLocker (accessed through Cashfree Payments and Decentro)**	KYC and verification service provider	Retrieving Officially Valid Documents issued to you and held in your DigiLocker account, for identity and address verification at onboarding, and for PAN verification.	Name, date of birth, PAN, Aadhaar (masked / XML), address, photograph
2	**CERSAI – Central KYC Records Registry (accessed through Decentro self-hosted service)**	Statutory registry and technology intermediary	Downloading your existing KYC record from the CKYCR for customer due diligence, and uploading, updating and reporting your KYC record to the CKYCR as required under the Prevention of Money Laundering Act, 2002 and the RBI Master Direction on KYC.	KYC Identifier, name, date of birth, address, OVD details, photograph
3	**Protean eGov Technologies Limited (NSDL)**	PAN verification agency	Online verification of the validity of your PAN and matching of name and PAN details.	PAN, name, date of birth
B. CREDIT ASSESSMENT AND UNDERWRITING				
4	**TransUnion CIBIL, Experian,**	Credit Information Companies	Obtaining credit information reports and scores for determining eligibility, underwriting and pricing; and periodic reporting of	Name, PAN, date of birth, address, mobile number, loan

Sr. No	Third Party	Role / Category	Purpose of Sharing	Personal Data Disclosed by KFSL
	Equifax and CRIF High Mark		your loan account and repayment conduct, as required under the Credit Information Companies (Regulation) Act, 2005.	account and repayment data
5	**Finvu (Finfactor Technologies)**	Account Aggregator	Initiating a consent request and retrieving your bank account statements, with your explicit consent, through the RBI-regulated Account Aggregator framework, for income assessment and underwriting.	Name and mobile number for the consent request; bank statement data is thereafter received by KFSL
C. COMMUNICATIONS AND CUSTOMER SERVICING				
6	**MSG91 and VILPOWER**	SMS and communication service provider	Delivery of one-time passwords and transactional and service-related messages, and of promotional messages where you have opted in.	Name, mobile number, loan account reference
7	**Exotel**	Cloud telephony service provider	Routing and recording of inbound and outbound calls for customer support, loan servicing and collection follow-up.	Name, mobile number, call recordings and call metadata
D. TECHNOLOGY INFRASTRUCTURE AND INFORMATION SECURITY				
8	**Amazon Web Services (AWS)**	Cloud infrastructure and hosting provider	Hosting, storage and processing of the Company's applications, databases and backups. AWS acts solely as a processor on the Company's instructions and does not access the data for its own purposes. Data is hosted in AWS regions located in India.	All categories of data described in Paragraph 4 of this Policy
9	**Vercel Inc.**	Website hosting and content delivery provider	Hosting and delivery of the Company's public website.	Usage and technical data, including IP address, device and browser data and cookie identifiers
10	**Sprinto**	Information security and compliance monitoring provider	Automated monitoring of information security controls, access reviews and collection of compliance evidence across the Company's systems.	System, configuration and access-log metadata only. No customer records are shared.

Part 2 – Parties that collect personal data directly from you (As on 30th October 2026)

The parties listed below collect certain information directly from you through their own interface, which is presented within the Company's application or website. The Company does not receive or store that information. Those parties determine the purposes and means of processing the data so collected, and their own privacy policies apply to it.

Sr. No.	Third Party	Role / Category	Purpose of Sharing	Personal Data Involved
11	**Razorpay**	Payment aggregator and mandate service provider	Processing of repayment and collection transactions, and registration. Payment and mandate details are entered by you directly into Razorpay's interface.	**Collected directly by Razorpay:** card, UPI, net-banking or bank account credentials and the related authentication details. These are not accessible to, received by or stored by KFSL. **Passed by KFSL to initiate the transaction:** name, mobile number, email address, amount and loan account reference. **Received back by KFSL:** transaction status, reference number and masked instrument details.
12	**Leegality**	Electronic signature service provider	Electronic execution of the loan agreement, sanction letter, Key Fact Statement and allied loan documents. Aadhaar-based authentication is completed by you directly within the e-signature interface.	**Collected directly by Leegality and the e-sign service provider:** Aadhaar number, e-sign one-time password and the authentication response. These are not accessible to, received by or stored by KFSL. **Passed by KFSL:** name, mobile number, email address and the documents to be executed. **Received back by KFSL:** the executed document and the e-signature audit trail.