

MAHAUTKARSH SECURITIES & FINANCE PRIVATE LIMITED

Privacy Policy



Approved on 1st April 2025

PRIVACY POLICY

1. INTRODUCTION

1. This Privacy Policy (“**Policy**”) outlines Mahautkarsh Securities & Finance Private Limited (“**Kishtope, MSPL, Mahautkarsh**”, “**We**”, or “**Us**” or “**Ours**”) practices in relation to the storage, use, processing, and disclosure of personal data that you (“**You**”) have chosen to share with Us when You download and use Our mobile application “Kishtope: Personal Loan App” or use the Services made available on [Kishtope.co.in](https://kishtope.co.in) (the app is referred to as the “**App**” and the App and the website are collectively referred to as the “**Platform**”).
2. The services We offer you on or through the Platform are referred to as “**Services**”, which shall be as defined in the Terms. Please note that unless specifically defined in this Policy, capitalised terms shall have the same meaning ascribed to them in Our Terms and Conditions, available at website <https://kishtope.co.in> (“**Terms**”). Please read this Policy in consonance with the Terms.
3. At Kishtope, we are committed to protecting Your personal data and respecting Your privacy. Please read the following terms of the Policy carefully to understand Our practices regarding Your personal data and how We will treat it. This Policy sets out the basis on which any personal data We collect from You, we collect about You, or that You provide to Us, will be processed by Us.
4. By providing Us with the consent to process Your personal data, you acknowledge that We will collect, store, use, and disclose Your personal data in accordance with this Policy.

2. THE DATA WE COLLECT ABOUT YOU

1. We collect, transmit, and store personal data about You on our secured Kishtope server after obtaining Your consent, to provide you with or in connection with the Services. Please note that We only collect and process a minimal amount of Your personal data to provide You with the Services. Such personal data includes:
 - I. Identity and profile-related data: This includes Your first and last name, parents’ name, date of birth, gender, photographs, educational qualifications, purpose of loan, house ownership, employment status, company name, contact information (including addresses, email IDs and phone numbers) and marital status. Reference details
 - II. KYC data: This includes identification documents issued by the government or other authorities, and includes details of, or pertaining to Your Aadhaar, PAN card, voter ID, etc.
 - III. Transaction data: This includes details of transactions that may occur through the Platform or in connection with the Services. For example, transaction data may include the Services You have sought or availed through the Platform or confirmations of such Services.

IV. Data from SMSs: With Your permission, we collect, transmit and store transactional SMS data from Your phone on Our secured server to verify and analyse Your financial position, to determine Your cash flow, credits, income, and spending pattern. We do not collect, read or store any personal SMSs, account details etc.

V. Financial data: This includes Your past credit history, income details, details of loans issued or otherwise applied for through the Platform, payments, and repayments thereof, bank account details, and bank account statements.

VI. Device data: This includes Your IP addresses, browser types and versions, time zone settings, operating systems, and device information. We collect, transmit, and store such data on Our secured Kishtope server. This data is collected for the purpose of data analytics.

VII. App data: We collect, transmit, and store the installed application's information on our secured Kishtope server. We only use the package name of each installed application to assess the creditworthiness and to provide customized loan offers.

VIII. For certain Services, including home loans and loans against property products available on our Platform, we may collect Your personal data through Our authorized service providers (who are independent third parties appointed by Us) or Our employees who visit you in-person. Such personal data includes:

- Identity and profile-related data: This includes photographs, and photocopies of identity related documents collected through physical forms.
- Attested photocopies of financial documents such as bank statements, salary slips, income tax returns.
- Attested photocopies of KYC documents such as masked Aadhaar, PAN, voter ID, etc.
- Attested photocopies of property documents (for loans against property product).
- Information collected during in-person interactions and customer verification visits.
- Records of document collection and handover maintained by the referral partners.

IX. We do not authorize Our service providers or employees to collect original documents from You. Only attested photocopies should be provided. Aadhar, if collected, shall be in masked format showing only the last 4 digits.

2. We do not access Your mobile phone resources such as contact list, call logs, telephony functions, and files & media (except as disclosed above in order to enable You to upload documents). We do not collect Your biometric data. However, we may take a one-time access of Your camera, microphone, location (fine and coarse GPS data), or any other facility for the purpose of onboarding or KYC checks (for such instance of access), after obtaining Your explicit consent, each time you avail certain Services. We collect, transmit, and store above mentioned data on Our secured Kishtope server. For certain Services, we may require access to be able to send SMS for the purpose of verification of Your device and phone number.

3. We are required to collect Your personal data to provide You with access to the Platform and Services. In certain cases, we are required to collect personal data as required by law, or under the Terms. If you fail to provide Us that data as and when requested by Us, we will not be able to perform Our obligations under the arrangement We have with You or are trying to enter into with You (for example, to provide You with features of the Services). In this case, we may have to cancel or limit Your access to the Services (or part thereof).

3. HOW WE COLLECT DATA ABOUT YOU

1. We use different methods to collect and process personal data about You. This includes:
 - a. Information You provide Us: This is the information (including identity, contact, KYC, financial, and device data) You consent to give Us when you Use Our Services or when You correspond with Us (for example, by email or chat, or through the Platform). It includes information You provide when You register to use the Services, use a Platform feature, share data through the Platform, or when You report a problem with the Platform and/or Our Services. If You contact Us, we will keep a record of the information shared during the correspondence.
 - b. Information We collect about You and Your device: Each time You visit the Platform or use the Services, we will automatically collect personal data through the use of tools like cookies.
 - c. Information We receive from other sources including third parties and publicly available sources: We will receive personal data about You from various third parties and public sources including Our third parties, Google analytics for advertising and user analytics purposes, and other publicly available sources. This information is used for conducting fraud checks, improving the Services and offering the credit products most suitable to You.
 - d. Information You provide our employees/service providers: We may engage third-party service providers including individuals to collect information (including identity, contact details, KYC and financial documents). Such information may be collected physically either by the employees of the Company or its service providers who will be deployed to your address. Such service providers will collect and have access to your personal data on a "need to know" basis to assist the Company in rendering its Services. You have the right to verify the identity of any individual claiming to be Our employee or service provider by requesting their identification credentials. We maintain a code of conduct for Our service providers and employees, and You have the right to report any suspicious or unauthorized behaviour to Us immediately at care@Kishtope.in or 080-69390476.
2. Please note that We do not have any control over personal data that You may choose to make publicly available. For example, if You post reviews, comments, or messages on public sections of the Platform or on an application store (such as the Play Store), You do so at Your own risk. We are not liable for third-party misuse of such data.

4. HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

1. We will only use Your personal data in accordance with the applicable law. Most commonly, we will use Your personal data to provide You with the Services, or where We need to comply with a legal obligation.
2. You agree and acknowledge that by using Our Services and creating an account on the Platform, You authorise Us, Our partners including but not limited to its Lenders, Insurance Partners, Third Party Insurance Intermediaries, Partnered FD Facilitators And Digital Gold Providers, and affiliates to contact You via email, phone, or otherwise in relation to making the Services available to You and the Services provided to You including but not limited to educating You of the credit products available to You, provision of customer support, resolving grievances/disputes in relation to the Service or the credit product availed by You and pursuant to the collection services offered to the Lender for the credit facilities availed by You.
3. In general, we use Your personal data for the following purposes and activities:
 1.
 - a. To register You as a user of the Platform;
 - b. To provide You with the Services;
 - c. To communicate to You details of the Services as requested by You or process queries raised by You on the Platform;
 - d. To facilitate Your KYC;
 - e. To facilitate Your application to avail loan and otherwise in connection with Your obtaining of credit facilities from regulated entities including Our Lenders;
 - f. To facilitate the provision of Services by Our partners, including but not limited to Our Lenders, Insurance Partners, Third Party Insurance Intermediaries, Partnered FD Facilitators and Digital Gold Providers;
 - g. To manage Our relationship with You, including notifying You of changes to any Services;
 - h. To administer and protect Our business and the Platform, including troubleshooting, data analysis, system testing, and performing internal operations;
 - i. To send You communication, including through WhatsApp business messages, calls initiated by Us via AI bots in relation to Your use of the Platform or Services;
 - j. To conduct data analytics, monitor trends so We can improve the Platform and Services;
 - k. To improve Our business and delivery models;
 - l. To perform Our obligations that arise out of the arrangement We are about to enter or have entered with You;
 - m. To enforce Our Terms;
 - n. To undertake marketing services, including sending You promotional messages or making promotional phone calls (including calls initiated by Us via our third-party service providers and/or AI bots) in relation to Services that are offered by our partners or by Us presently or may be offered in the future;
 - o. To respond to court orders, establish or exercise Our legal rights, or defend Ourselves against legal claims;

- p. In compliance with the Reserve Bank of India's norms, including to contact You or locate You in case of Your default, in relation to certain Services;
- q. In compliance with the Insurance Regulatory and Development Authority of India's norms; and
- r. To ensure compliance with applicable laws.

5. HOW WE SHARE YOUR PERSONAL DATA

1. You agree and acknowledge that any and all information pertaining to You, whether or not You directly provide it to Us (via the Services or otherwise), including but not limited to personal correspondence such as emails, instructions from You, etc., may be collected, compiled, and shared by Us with third parties after obtaining Your explicit consent, solely in order to render the Services to You. This may include but not be limited to Lenders, Insurance Partners, Third Party Insurance Intermediaries, Partnered FD Facilitators Digital Gold Providers and (as defined in the Terms), other partners engaged by us who facilitate the provision of Services and products available on Our Platform, storage providers, data analytics providers, consultants, lawyers, and auditors. We may also share this information with other entities in the Kishtope group in connection with the above-mentioned purposes. If You fail to provide consent for sharing of such data when requested by Us, we may not be able to perform Our obligations under the arrangement We have with You or are trying to enter into with You. In this case, we may not be able to provide the Services to You.
2. You agree and acknowledge that by using Our Services and creating an account on the Platform, you authorise Us, our associates, partners, service providers, and affiliates to contact You via email, phone, or otherwise. This is to ensure that You are aware of all the features of the Services and facilitate You in Your access and use of the Services.
3. You agree and acknowledge that We may share Your data, where We are required by law, any court, a government agency, or authority to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or the Terms, or in order to comply with any applicable laws and regulations.

6. ACCESS AND UPDATING YOUR PERSONAL DATA

You hereby warrant that all personal data that You provide Us with is accurate, up-to-date, and true. When You use Our Services, we make best efforts to provide You with the ability to review and correct inaccurate or deficient data (as has been set forth in the Terms), subject to any legal requirements. We shall have the right to verify the accuracy of the personal data You provided to Us either directly or through third-party service providers engaged by us.

7. DATA SECURITY

1. We implement appropriate security measures and access controls to protect Your personal data from unauthorised access, and follow technology standards prescribed by applicable law, including the Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Digital Personal Data Protection Act, 2023 and

the rules enacted thereunder (as and when enforced), and by RBI ensuring up-to-date physical security, such as secure areas in offices; electronic safeguards, such as passwords, firewalls, and encryption; and secure development procedures. Our safety and security processes are audited by a third-party cyber security audit agency from time to time.

2. In the scenarios where personal data collection is mandatory, for instance any information required to pull bureau report or for loan application, we encrypt the data with the latest security algorithms before transmitting the data. All such data is encrypted at rest.
3. Information You and Lenders provide and receive during the Services is transmitted through a secure sockets layer (SSL) transmission. We encrypt and store personal data wherever it is possible. No data is shared with any third party unless until it is a core feature to serve the end-user, in all such scenarios the user consent is taken.
4. We restrict access to Your personal data only to those employees' authorized persons, third-party service providers who are required to know such information in order to provide Our Services to You. We train Our employees, authorized persons, third-party service providers on all Our security procedures.
5. We have internal processes and policies in place to tackle incidents of information security breach. This process enables the incident response team to detect, analyse, contain, eradicate and recover from information security breach incidents. In the event there is a security breach, we will take adequate timely measures to mitigate any risk to the data collected/ stored and take all necessary actions required under applicable law. In the event Your data is impacted, we will take reasonable measures to keep You informed.
6. While We impose strict contractual obligations on Our service providers regarding data protection, our service providers are independent third parties. We shall not be liable for any unauthorized acts or data breaches by the service providers that occur outside the scope of their authorized activities or in violation of Our contractual requirements. We shall only be responsible for ensuring that the service providers are contractually obligated to comply with applicable data protection laws and Our security standards.

8. DATA RETENTION AND DESTRUCTION

For information about Our retention and destruction practices, please refer to the Schedule to this Policy.

9. YOUR LEGAL RIGHTS

1. Under certain circumstances, you have the right to:
 - a. Request the erasure of Your personal data: This enables You to ask Us to delete or remove Your personal data. We shall comply with any request, subject to applicable laws and the terms applicable to the Services you have availed through the Platform.
 - b. Right to deny consent: This enables You to deny Us the consent necessary to process Your personal data. If You exercise this right, it may impact or restrict Our ability to provide Services to You.
 - c. Right to revoke consent: This enables You to withdraw consent provided to Us previously for specific use of information, storing of information, sharing

Your information with Our Lenders, Insurance Partners, Third Party Insurance Intermediaries, Partnered FD Facilitators, Digital Gold Providers and third parties and consent to contact You. We shall comply with any request, subject to applicable laws and the terms applicable to the Services You have availed through the Platform.

- d. Right to rectify: We disclaim all liability and responsibility for the authenticity of the information provided by You to Us. However, you have the right to review and correct, update and/or amend Your information provided to Us previously for it to be accurate, complete and up to date. However, kindly note that in a situation where You deny consent, withdraw consent, avail the right to be forgotten, or provide inaccurate information, you may not be able to avail the entire scope of Our Services, and in such instance, we reserve the right to not provide You access to Our Services or any part thereof.
2. Notwithstanding Your right 9.1 (a) and (c), We reserve the right to retain information to the extent required for below mentioned purposes:
 - a. Comply with applicable laws;
 - b. Enforce Our legal rights; or
 - c. To provide any information required by regulatory authorities investigating any fraud or illegal activities.
3. However, Our Lenders, Insurance Partners, Third Party Insurance Intermediaries, Partnered FD Facilitators and Digital Gold Providers and such other partners who facilitate the provision of Services may contact You regarding Your potential or Your Use of the Services. This includes Our Lenders contacting You about and in relation to Your loan application, and payment of dues. Us and Our Lenders shall continue processing Your information, if Your application for provision of loan was sent to the Lender or if You have availed any loan from Our Lenders till all dues of such loan are paid. The Lenders may store Your information for as long as required to be stored per applicable laws. The Lenders may also require Us to retain information in circumstances the Lender has outsourced any services in relation to such loan, such as collection of dues, to Us and in such cases, we will be required to retain Your information for the period required by the Lender. We may deploy AI systems, tools and technologies either developed in-house or are deployed by Our third-party service providers, for specific tasks in payment collections, such as payment reminders, etc., and for this purpose, we will share Your information with the AI system.
4. If You wish to exercise any of the rights set out above, please write an email to the Grievance Officer, whose details are mentioned in Section 15 of this Policy, providing in as much detail as possible, the right(s) You wish to exercise. Please also include a description of the personal data You believe we hold or process about you, so that We may be able to locate such personal data. In the event that We need additional information from You, Our Grievance Officer will contact You further.
5. We will be able to reply to Your request(s) within 30 (thirty) days of raising the request. In the event that We are not able to respond to or acknowledge Your request within 30 (thirty) days of receipt due to any reason, we will inform You.

10. TRANSFER OF PERSONAL DATA

1. Please note that all Your data, including financial data collected by Us, is only stored on systems located in India. We do not transfer Your personal data to any third country.
2. We share Your information with Lenders and third parties, to contact You regarding any loan product You express interest in or for completing a loan application, KYC check, collection of KYC documents, bank authentication purpose, to perform employment checks, for NACH registrations, and loan repayment purposes. We also share Your information with Insurance Partners, Third Party Insurance Intermediaries, Partnered FD Facilitators and Digital Gold Providers who facilitate the provision of Services.
3. A list of Our Lenders or other affiliates is available at website and list of the key third party service providers that gain access to Your information during the loan journey is provided.

11. LINKS TO THIRD PARTY WEBSITES

Our Services may, from time to time, contain services provided by or links to and from the websites of Our partner networks, service providers, financial institutions, advertisers, and affiliates (“**Third Party Services**”). Please note that the Third-Party Services that may be accessible through Our Services are governed by their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through such Third-Party Services. Please check their policies before You submit any personal data to such websites or use their services.

12. COOKIES

1. Cookies are small data files that are stored on Your device. We use cookies and other tracking technologies to distinguish You from other users of the Services and to remember Your preferences. This helps Us provide You with a good experience when You use Our Services and also allows Us to improve the Services.
2. We identify You by way of using cookies. The cookies shall not provide access to data in Your device such as email addresses or any other data that can be traced to You personally. The data collected by way of cookies will allow Us to administer the Services and provide You with a tailored and user-friendly service. The cookies shall enable You to access certain features of the Services. Most devices can be set to notify You when You receive a cookie or prevent cookies from being sent. If You prevent cookies from being sent, it may limit the functionality that we can provide when You visit the Platform or try to access some of the Services.
3. Additionally, you may encounter cookies or other similar technologies on certain pages of the Platform that are placed by third parties. We do not control the use of cookies by such third parties.

13. BUSINESS TRANSITIONS

You agree and acknowledge that in the event We go through a business transition, such as a merger, acquisition by another organisation, or sale of all or a portion of our assets, your personal data might be among the assets transferred.

14. CHANGE IN PRIVACY POLICY

1. We keep Our Policy under regular review and may amend it from time to time, at Our sole discretion.
2. The terms of this Policy may change and if it does, these changes will be posted on this page and, where appropriate, notified to You by email or phone number through SMS.

15. GRIEVANCE OFFICER

You may contact Our Grievance Officer with any enquiry relating to this Policy or Your personal data.

- Name: Mr. Mudit Deshmukh
- Address: Shop No 5, First Floor, Ashirwad Bhavan, Byron Bazar 492001(C.G.)
- Email Address: grievance@Kishtope.in

16. GOVERNING LAW AND DISPUTE RESOLUTION

The provisions of governing law and dispute resolution mechanism as specified in the Terms shall be applicable to this Privacy Policy.

SCHEDULE

DATA RETENTION AND DESTRUCTION POLICY

1. OVERVIEW

This Data Retention and Destruction Policy describe Kishtope's policy on data retention and destruction.

2. HOW LONG DO WE STORE YOUR DATA

You agree and acknowledge that your personal data will continue to be stored and retained by Us as required or permitted by applicable laws or regulatory requirements, or as required for defending future legal claims. All the other details, which are not required to be retained per applicable laws or regulatory requirements, or as required for defending future legal claims, will be deleted or render the data into anonymised data upon the request of the customer for the deletion of the data, provided there is no active loan or service being availed by You. However, in some instances, we will be unable to facilitate requests for the deletion of Your data in compliance with legal obligations, or in accordance with applicable laws, which may require Us to store data for longer periods of time.

3. OUR DATA DESTRUCTION PROTOCOLS

Upon completion of the retention period for each category of personal data as described above, we shall delete or destroy, to the extent technically possible, personal data in Our possession or control, or render the personal data into anonymised data, so that it no longer constitutes personal data.