

### **DATA PRIVACY POLICY**

**This Policy is applicable to the following entities:**

<b>S. No</b>	<b>Name of the Company</b>
1.	L&T Finance Limited

### **Copyrights**

All rights reserved. No part of this document may be reproduced or transmitted in any form and by any means without the prior permission of LTFS.

This Data Privacy Policy sets forth the Reasonable Security Practices and Procedures adopted by LTFS and shall apply to use and disclosure and sharing of individuals Sensitive Personal Data or Information (“**personal information**”) provided by individual to LTFS employee in person, on the website/ web application, mobile application or otherwise. This privacy policy shall be read in conjunction with the terms of use agreed by the individual while registering with LTFS for availing its services. LTFS information resources in scope includes Cloud IT environment as well.

## **Consent**

LTFS shall obtain an individual's consent in writing/electronically to collect, use, retain or disclose their personal data having an audit trail for the purposes connected to the terms of use and for providing Services. Personal information for purposes of this Policy means information that identifies individuals, such as individual's Name, Address, Date of birth, Bank Account details , Phone number, Fax number or Email address etc. and shall be collected on need basis. All or any personal information so provided will be as and on basis. LTFS shall not be responsible for unverified personal information supplied by individuals. LTFS shall not collect or store biometric data of customers unless allowed under extant statutory guidelines and shall desist from accessing mobile phone resources like file and media, contact list, call logs, telephony functions, etc unless needed for the purpose of providing services by LTFS. This personal information collected from individuals is solely for the purposes connected with the terms of use and which has been agreed by individuals.

To onboard the customer or individual through the use of mobile or web application, a one-time limited mobile resource access for camera, microphone, location or any other facility necessary, shall be requested for the purpose of on-boarding and KYC requirements.

Individuals have the option to not agree to the collection of personal information. If the individual chooses not to agree with the policy, the individual will not be entitled to use the Services as per the Terms of Use. Individuals can also **at** any time withdraw the consent and delete/ forget data by uninstallation of the application from the device of the individual subject to regulatory requirements.

## **Purpose:**

LTFS needs this minimal information to operate and provide various Services. LTFS uses and discloses the individual personal information only as follows:

1. To fulfill the individual requests for products and services offered and subscribed and accepted by individual
2. To deliver to individual any administrative notices, alerts, advice and communications relevant to individuals use of the Service
3. Share individual's information with their group companies and other third parties in so far as required for purpose of providing additional services and / or to similar services to provide individual with various value-added services
4. For market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
5. To third-party contractors that provide services to LTFS are bound by similar privacy restrictions;

6. To enforce LTFS's Terms of Use;
7. All such personal information collected shall be retained so long as individuals are having account with LTFS and remain active to avail various services or as may be required under the law. In case of deactivation / termination of the account / services with us, the personal information provided will no longer be used unless consented for.

**Update Personal Information:**

LTFS encourages the individual to update this information as and when there are any changes. The Individual is also entitled to review the information provided and ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient be corrected or amended as feasible. However, LTFS shall not be responsible for unverified personal information or sensitive personal data or information supplied by individuals.

**Sharing/Transfer/Disclosure of Personal information:**

Personal information of the users/individual will not be sold or otherwise transferred to unaffiliated third parties unless otherwise stated at the time of collection or without the approval or consent of the user/individual as the case may be. However, LTFS can share, exchange and disclose personal information of the individual to our partners with prior consent of the individual to deliver individual products and services or as required under applicable laws.

LTFS treats individual's personal information or individual's use of the service as private and confidential and does not check, edit, or reveal it to any third parties except where it is expressly agreed and where it believes in good faith, such action is necessary to comply with the applicable legal and regulatory processes, or to protect and defend the rights of other users or to enforce the terms of service. LTFS may disclose personal information where it is under legal obligation to do so or where it is mandated under law. LTFS may transfer sensitive personal data or information to another Indian or overseas body corporate that ensures the same level of data protection that is adhered to by LTFS, if it is necessary for the performance of a lawful contract between LTFS or any person on individual's behalf or where individual have consented to the data transfer.

Lending Service Providers/third parties engaged by LTFS for providing services in respect of lending through mobile or web-based applications also have a contractual obligation to comply with various technology standards/ requirements on cybersecurity stipulated by RBI and other agencies, as may be specified from time to time.

Details of third parties (where applicable) allowed to collect personal information through the web-based or mobile application is as available on [www.ltfs.com](http://www.ltfs.com).

**Unsolicited Information:**

Except where specifically agreed or necessary for operational or regulatory reasons, LTFS will not send the individual any unsolicited information. However, to help the individual to take full advantage of the service offerings of LTFS, the individual will have the opportunity to indicate whether the individual would like to "opt out" of receiving promotional and/or

marketing information about other products, services and offerings from LTFS and/or any third parties etc. If the user does not opt out, LTFS may use any email addresses of users to send occasional emails pertaining to the said information. The user can nevertheless unsubscribe from receipt of such emails by following instructions therein or by communicating accordingly to LTFS.

### **Retention of Personal Information:**

LTFS shall not retain personal information of customers except personal information/data that may be required to carry out their operations under applicable laws/regulations. LTFS shall not retain personal information longer than the purpose for which it is sought is served or is otherwise required under any other law for the time being in force or in line with regulatory requirements. The information so collected shall be used only for the purpose for which it is collected.

All data is stored only in servers located within India, while ensuring compliance with statutory obligations/ regulatory instructions.

### **Disposal, Destruction and Redaction of Personal Data**

LTFS Data Retention and Disposal require managerial approval for the disposal, destruction and deletion of any personal data. Our disposal, destruction and redaction procedures prevent the recovery, theft, misuse or unauthorized access of personal data. For more information regarding this process.

### **Use of Cookies:**

LTFS websites may use "cookies" (information stored on an individual's computer by an individual's browser at our request). "Cookies" is a term generally used for small text files a web site can use to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behavior and compile aggregate data that will allow content improvements and targeted advertising etc. Cookies themselves do not personally identify individuals but they do identify individual's computers or devices. Generally, cookies work by assigning a unique number to the user computer/device that has no meaning outside the assigning site. Users are also being made aware that LTFS cannot control the use of cookies or the resulting information by advertisers or third parties hosting data on LTFS website. If a user does not want information collected through the use of cookies, there is a simple procedure in most browsers that allows the user to deny or accept the cookie feature.

### **Security of Data**

LTFS is ISO27001:2013 certified and deals with mostly personal identifiable information (PII) of users, it becomes imperative to protect such information as soon as they are in the LTFS network and the ownership of the data lies with the IT Team. Below are the security measures taken to prevent misuse of this type of information.

1. LTFS has implemented physical, administrative and technical security measures across the organization which are designed to prevent data loss, unauthorized access to personal data and misuse, disclosure, alteration, damage or destruction

- of personal data.
2. Sensitive PII data are encrypted at rest using strong encryption algorithms. The keys used for such encryption algorithms are stored securely and access to keys are restricted to authorized entities only.
  3. We fully understand that the personal data collected from individuals is under our guardianship. Therefore, LTFS trains its employees on the privacy policy as well as information security procedures regarding the appropriate access, use, and disclosure of personal data.
  4. LTFS also conducts periodic risk assessments on the processes, information systems and third parties, including audits of third-party facilities and information systems.
  5. LTFS also conducts third party audit & assessment on periodic intervals for critical vendors
  6. LTFS has in place an incident response plan with trained personnel to respond to, investigate and mitigate the impact of any incident.
  7. LTFS also maintains adequate plans for business continuity management, as well as disaster recovery processes for testing databases, servers, information systems and processes that handle personal data.
  8. This Data Privacy policy shall be read in conjunction with LTFS Information Security policies.

## **Quality**

LTFS informs individuals that they have a responsibility to provide accurate, complete and relevant information in order to maintain the quality and integrity of all personal data. Individuals may contact LTFS designated personnel for any updates or corrections. Individuals may verify and challenge the accuracy and completeness of their personal data and have it amended or deleted if appropriate.

## **Compliance and Reporting**

LTFS is committed to comply with this Policy and with applicable privacy laws, regulations and obligations. LTFS conducts regular audits of our compliance with applicable privacy policies, procedures, laws, regulations, contracts and standards under applicable regulations.

## **Change in Privacy Policy**

LTFS reserves the right to change Privacy Policy at any time. Users may note that this Privacy Policy itself and any such change of policy will be effective from the date of posting on the site. Any changes to the policy shall be disclosed to the users on [www.ltfs.com](http://www.ltfs.com).

## **Grievances:**

For any grievances redressal note the redressal process under the Grievance Redressal policy as available on [www.ltfs.com](http://www.ltfs.com).

## **Review / Revision of Policy**

If at any point a conflict of interpretation / information between the Policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities ("Regulatory Provisions") arises, then interpretation of the Regulatory Provisions shall prevail. In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the Policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions.

## Version Control

Version	Date of adoption	Change reference	Owner	Approving authority
1	January, 2023	Adoption of policy by the Board.	Information Security Risk Team	Board of Directors