

Sahay GeM App Privacy Policy

When you use the Sahay GeM application (**App**), some personal information is collected from and about you. The Sahay GeM ecosystem participants more fully described in App Terms of Service (**Participants**) are committed to protecting the security of this information and safeguarding your privacy. This privacy policy sets out the details of the personal information collected, the manner in which it is collected, by whom as well as the purposes for which it is used. At registration you accepted the terms of this Privacy Policy and your use of the App signifies your continued acceptance thereof. This Privacy Policy may be revised from time to time and you will be notified of all such changes. In order to use the App, you will be required to consent to the terms of the Privacy Policy as revised from time to time.

1. INFORMATION COLLECTED AND MANNER OF COLLECTION

When you register on the App, the following information will be collected from you – (i) name; (ii) phone number; (iii) age; (iv) address; (v) PAN; (vi) GST user name; (vii) GST identity number, and (viii) bank account number.

2. USE OF INFORMATION

The personal information collected from you as set out in Clause 1 shall be utilised for the purposes of identifying you, evaluating your creditworthiness, offering or providing products or services to you, communicating the loan offer, displaying information about the loan, establishing the escrow account and for the fulfillment of any obligations or requirements of any of the Participants including disbursing, servicing and recovering the loan. The information collected under Clause 1 will not be used for any purpose other than those mentioned in this Clause 2.

3. RETENTION

All personal information collected under Clause 1 shall only be retained by each Participant for as long as is necessary for such Participant to perform its obligations as set out under these Terms and in compliance with the applicable statutory/ regulatory requirements and the record retention policy of the respective Participants, and no longer.

4. RIGHTS

You shall have the right to access your profile on the App at any time to add, remove or modify any registration information that you have supplied, after which point the Participants shall only use the revised registration information. Your addition, removal or modification of the registration information shall not prejudice any prior use by the Participants thereof. You shall, however, commit to only providing information that is true and accurate.

5. DATA SECURITY

The Participants shall take all organisational and technical measures required under any law or statute applicable to a given Participant, to protect the confidentiality and security of the information in their control. Participants shall ensure that data is encrypted in transit as well as at rest.

6. DISCLOSURES AND TRANSFER

No personal information collected by the Participants will be disclosed or transferred to any third party other than (i) one of the other Participants who is similarly bound by the terms of this Privacy Policy or (ii) any third-party as may be necessary for the performance by the Participant of its obligations or the exercise of its rights or for such other purposes as are legally or contractually permissible or save as otherwise agreed between such Participant and the Borrower and in accordance with the statutory and regulatory provisions applicable to the Participant.

7. GRIEVANCES

If you have any concerns or questions in relation to this Privacy Policy, you may address them to the officer appointed by the relevant Participant in respect of which you have a question or a concern. Each Participant has published details of such data protection officers here:

- (a) GeM - dceo.grievance@gem.gov.in
- (b) UGro Capital - customercare@ugrocapital.com
- (c) ICICI Bank - headservicequality@icicibank.com
- (d) Juspay - gemsahay-grievance@juspay.in