

# PRIVACY POLICY

## SECTION 1 – GENERAL CONSENT

This privacy policy ("**Privacy Policy**") provides You with details about the manner in which Your data is collected, stored & used by Us. You are advised to read this Privacy Policy carefully. By registering on the Website (as defined below), using any medium: mobile app, website, web app, mobile site or otherwise, You permit Us to use & disclose Your Personal Information (defined below) in accordance with this Privacy Policy by providing Your consent to this Privacy Policy. If You do not agree to the terms of the Privacy Policy, please do not use or access the Website.

**"Personal Information"** of a person means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with Us, is capable of identifying such person and includes, (wherever appropriate and/or mandated under applicable laws) personal information categorized as sensitive personal data or information under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 as below:

- i. Password;
- ii. Financial information such as Bank account or credit card or debit card or other payment instrument details;
- iii. Physical, physiological and mental health condition;
- iv. Sexual orientation;
- v. Medical records and history;
- vi. Biometric information;
- vii. Any detail relating to the above clauses as provided to body corporate for providing service; and
- viii. Any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise.

Sensitive personal data or information that is freely available, accessible in the public domain, or available under the Right to Information Act 2005, is excluded from the scope of this definition.

Throughout this Privacy Policy, the capitalized terms "**Supergrowth Investments Private Limited**" "**We**", "**Us**" and "**Our**" refers to Supergrowth Investments Private Limited, its affiliates and assigns, and the terms "**User**", "**You**", "**Your**", and "**Yourself**" refer to the users of the Website whose Personal Information is being collected in accordance with the terms of this Privacy Policy.

This Privacy Policy applies to all forms of Personal Information, physical and digital, whether collected or stored electronically or in hardcopy.

Supergrowth Investments Private Limited is committed to protect Your Personal Information and would endeavour to protect such information from unauthorized use. This Privacy Policy applies to all applicants/ customers including online and offline applying for Services from/ through

Supergrowth Investments Private Limited or using Our website <http://supergrowth.in> or any other web/ mobile application of Supergrowth Investments Private Limited (such website and/ or web/ mobile applications referred as “**Website**”) through which You may apply for a short term loan or long term loan (collectively “**Loan**”) to be granted by various non-banking financial company OR Banks (collectively “**Lender**”), based on the loan agreement executed between you and LENDER. The terms and conditions of Website use as mentioned in ‘Policy on Website Use of Supergrowth Investments Private Limited’ (“**Terms of Use**”) as amended from time to time is incorporated herein by way of reference.

## **SECTION 2 – TYPE OF INFORMATION COLLECTED**

When You use the Website, We collect and store Your Personal Information which is provided by You from time to time. This allows Us to provide services and features that most likely meet Your needs, and to customize the Website to meet Your requirements and make Your experience safer and easier. We collect Personal Information from You that We consider necessary for achieving this purpose.

Once You create an account (register) on the Website and give Us Your Personal Information, You are not anonymous to Us. Wherever possible, We indicate which fields are required and which fields are optional. If You are unable to provide the information We need, We may not be able to provide You with the product or service You have requested

### **INFORMATION THAT WE COLLECT FROM YOU WOULD INCLUDE:**

In order to determine Your eligibility and enable the products/Services offered on the Website for You, We collect and process certain categories of Personal Information belonging to You, including the following:

- i. Personal information like date of birth, age, marital status, birthplace, nationality, Contact information (**e.g., name, address, telephone, and email address**).
- ii. Government-issued identifiers, including PAN and GST information.
- iii. Financial information, including bank account details, credit/debit card details, billing information, tax information and payroll information (as applicable); and
- iv. KYC Information: Address Proof, Business Proof, Photographs, ID Proof and signature copies.
- v. Information which would help determine Your eligibility to avail the Services offered on the Website.
- vi. Any other information that is required to collect as per specific mandate from any bank, NBFC or as a requirement under applicable law, regulation, rule or statute in India.

We collect the above-mentioned Personal Information and information obtained through use of Cookies for the following purposes of:

- i. To create Your login credentials or establishing Your account on the Website;
- ii. To provide and improve Supergrowth Investments Private Limited’s Services and features on the Website that You request;

- iii. To resolve disputes and troubleshoot problems;
- iv. To help promote a safe service on the Website and protect the security and integrity of the Website, Supergrowth Investments Private Limited's Services and the Users;
- v. To inform You about online and offline offers, products, services, and updates;
- vi. To customize Your experience on the Website or share marketing material with You;
- vii. To detect, prevent and protect Us from any errors, fraud and other criminal or prohibited activity on the Website;
- viii. To enforce and inform about Our Terms of Use;
- ix. To process and fulfil Your request for Supergrowth Investments Private Limited's Services or respond to Your comments, and queries on the Website;
- x. To contact You;
- xi. To allow Our business partners including partnered financial institutions and/or associates to present customized messages to You;
- xii. To communicate important notices or changes in Services provided by Supergrowth Investments Private Limited, use of the Website and the terms which govern the relationship between You and Us; and
- xiii. For any other purpose after obtaining Your consent at the time of collection.

We may obtain some of Your information including Personal Information from third parties, or from publicly available sources. The third parties from who We obtain Your information include Our business partners, independent service providers, ministry of corporate affairs, banks, payment partners, financial institutions and from credit reference agencies and credit bureaus on Your behalf etc. You hereby provide Your unconditional consent for Us to do so subject to the applicable law for the time being in force.

We will not use Your email address/mobile number for unsolicited emails and/or SMS. Any emails and/or SMS sent by Supergrowth Investments Private Limited will only be in connection with the provision of agreed service products and this Privacy Policy. If You are no longer interested in sharing your Personal Information or wish to change/ modify the Personal Information, please e-mail your request to [contact@supergrowth.in](mailto:contact@supergrowth.in)

### **SECTION 3 - INFORMATION SHARING AND DISCLOSURE TO THIRD PARTIES**

We may disclose Personal Information to third parties who work on Our behalf on a need-to-know basis and, provided that such third parties adhere to the confidentiality obligations consistent with this Privacy Policy. These third parties are authorized to use Your Personal Information only as necessary to provide Our Services requested or availed by You. These Services may include providing cloud computing infrastructure, Website crash reporting, Website usage pattern so that We can serve You better and providing customer support or account administration. The list of third parties with whom We share Your information (including Personal Information) is available at <https://supergrowth.in/>. We will take Your specific consent in case We wish to share Your information with any other third party and update the aforementioned list.

The Website does use third party services that may collect information used to identify You. We may disclose Your Personal Information to law enforcement offices, third party rights

owners, or others in the good faith belief that such disclosure is reasonably necessary to: enforce the Terms of Use or this Privacy Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of Our users or the general public.

We may, in compliance with applicable laws, share/transfer/assign all of Your Personal Information and other information with any other business entity(ies), in the event of a merger, sale, re-organization, amalgamation, joint ventures, assignment, restructuring of business or transfer or disposition of all or any portion of Our business.

## **SECTION 4 - DATA RETENTION**

We shall be entitled to retain Your Personal Information and other information for such duration as may be required for the purposes specified hereunder or for such other periods as may be required under the applicable laws and the said information will be used by Us only in accordance with this Privacy Policy. Notwithstanding anything contained herein, We will not retain your Personal Information and other information for longer than the periods provided below.

<b>Type of Data</b>	<b>Data Retention Period</b>
Personal Information	End of Your relationship with Us + 3 years

However, We may retain information related to You if We believe it may be necessary to prevent fraud or future abuse, to enable Us to exercise Our legal rights and/or defend against legal claims or if required by law or for other legitimate purposes. When the retention period for Your Personal Information expires, We will actively destroy/delete such Personal Information and other information from Our systems.

We will comply with the following procedure for destruction and disposal of Your Personal Information and other information:

- i. IT department is responsible for deleting or destroying electronic records. This includes ensuring that the Personal Information and other information is permanently removed and from company system and destroyed.
- ii. No Personal Information and other information that are currently involved in, or have open investigations, audits, or litigation pending shall be destroyed or otherwise discarded.
- iii. When retention requirements have been met, Personal Information and other information shall be immediately destroyed.
- iv. The authorized methods of destruction for non-electronic Personal Information and other information are shredding.

## **SECTION 5 – SECURITY**

You are aware of all security risks, including possible third-party interception of any of Your transactions and statements of account on the internet and the content of Your transactions

or statements of account becoming known to third parties. You agree and undertake that You shall not hold Supergrowth Investments Private Limited liable therefore in any way. The use and storage of any information, including without limitation, the credit card number, PIN, password, account information, transaction activity, account balances and any other information available or stored on Your Device is at Your own risk and responsibility. You furthermore acknowledge and accept that Supergrowth Investments Private Limited may not encrypt all content or communications from and to Your website(s).

This Privacy Policy and the security controls and practices implemented by the Company to protect Your Personal Information shall be the reasonable security practices and procedures under Section 43A of the Information Technology Act, 2000. Further, We shall also ensure compliance with various technology standards/requirements on cybersecurity stipulated under applicable laws, in provision of Our Services to You.

## **SECTION 6 - COOKIES**

"**Cookies**" are small computer files that are transferred to Your computer's hard drive that contain information such as user ID, user preferences, lists of pages visited and activities conducted while browsing the Website. Cookies are data collection devices to help analyze Our web flow and measure promotional effectiveness. Most cookies are session cookies, meaning that they are automatically deleted from Your hard drive at the end of a session. You are always free to decline a cookie if Your browser permits. At Your option, expense and responsibility, You may block cookies or delete cookies from Your hard drive. However, by disabling cookies, You may not have access to the entire set of features of the Website.

Generally, We use Cookies to customize Your experience on our Website and to store Your password so You do not have to re-enter it each time You visit the Website. We do not link the information stored in these Cookies directly to any of Your Information You submit while on the Website.

## **SECTION 7 – AGE OF CONSENT AND ELIGIBILITY TO USE**

Use and access to the Website is available to all persons who can be legally bound by contract and who are not disqualified or declared incompetent under the Indian Contract Act, 1872. You hereby represent that You are: (i) of legal age to form a binding contract i.e., above 18 (eighteen) years of age (ii) not a person barred from receiving the Services of Supergrowth Investments Private Limited from the Website under the applicable laws and (iii) competent to enter into a binding contract. In case You are accessing the Website as a representative of and on behalf of a legal entity or organisation, (i) You represent and warrant that You have the full authority to represent the legal entity and have power to bind them; and (ii) You understand that the Privacy Policy, upon acceptance by You, is applicable to and binds all other persons accessing or using the Website and the Services of Supergrowth Investments Private Limited on behalf of the same legal entity or organisation for this purpose.

## **Section 8 - YOUR CONSENT AND CHANGES TO PRIVACY POLICY:**

**Withdrawal of consent:** You may choose to withdraw Your consent (including regarding processing of data by Us or by any third party or regarding data retention) provided hereunder at any point in time. Such withdrawal of the consent must be sent in writing to [contact@supergrowth.in](mailto:contact@supergrowth.in) . In case You do not provide Your consent or later withdraw Your consent, We request You not to access the Website and use the Services provided by Us and also reserve the right to not provide You any such Services on the Website. In such a scenario, Supergrowth Investments Private Limited may delete Your information (personal or otherwise) or de- identify it so that it is anonymous and not attributable to You.

**Correcting inaccuracies in the information:** You may correct or update any information online. In the event of loss of access details, You may retrieve the same or receive new access details by sending an e-mail to: [contact@supergrowth.in](mailto:contact@supergrowth.in) .

**Right to Erasure:** This is also known as ‘the right to be forgotten’ and, in simple terms, enables You to request the deletion or removal of Your Personal Information where there’s no compelling reason for Us to keep it. Such right of erasure can be exercised by writing to Us at [contact@supergrowth.in](mailto:contact@supergrowth.in) is not a general right to erasure; there are exceptions, such as when the law requires Us to retain certain personal information about You or where such retention is required for providing Our Services to You, etc.

## **SECTION 9 - LINKS TO OTHER SITES**

This Service may contain links to other sites. If You click on a third-party link, You will be directed to that site. Note that these external sites are not operated by Us. Therefore, We strongly advise You to review the privacy policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services

## **SECTION 10 - CHANGES TO THIS POLICY**

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Website.

## **CONTACT US**

If You have questions, concerns or grievances regarding this Privacy Policy, You can email us at Our Nodal Grievance Officer:

Email: [contact@supergrowth.in](mailto:contact@supergrowth.in)

Address: A5, SAKET FORT, Innov8 MGF Saket Driveway Saket District Centre New Delhi 110017