

Zoho Finance Private Limited- Privacy Policy

Scope of the Privacy Policy

Mudhalpadi is a brand by Zoho Finance Private Limited (ZFPL) which provides various financial products and services. This Privacy Policy explains how Mudhalpadi ("we", "us", or "our") collects, uses and processes personal information relating to its prospects, website visitors, customers, and other individuals that interact (both online and offline) with Mudhalpadi ("you", "your"). This privacy policy governs your interactions with Mudhalpadi, and is not applicable to you when you use other websites, products or services that have a separate privacy policy.

Information that we collect and use

We collect information about you only if we need the information for achieving the purpose specified in this policy. We will have information about you only if (a) you have provided the information yourself, (b) We have automatically collected the information, or (c) We have obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

Information that you provide us

i. **Account creation:**

When you sign up on our website to access the services of Mudhalpadi or approach us offline for availing our services we will set up a website account for you with Mudhalpadi. We also setup a loan account for you when you avail our products or services. You can use the website account to avail the products and services offered and to manage your loan account with us. We ask for information such as your name, contact number, and date of birth to complete the account signup process. You may be required to choose a unique username and a password for accessing the created account. You may also provide us with more information such as your time zone and language, but we don't require that information to sign up for an account.

ii. KYC verification:

We are required to conduct a thorough KYC verification process before onboarding you as a customer of Mudhalpadi. As part of this KYC process we will collect certain information including personally identifiable information about you or representatives of your business. Apart from the [other documents](#) that you submit to us, we collect marital status, citizenship, employment details, photo, signature including digital signature, Aadhar number and biometric data as part of the KYC process. We will also ask you to furnish your credit information such as past loan records, bank statements, income source and proofs, and information and documents regarding the collateral (if you are availing a secured loan). Additionally, in order to conduct video KYC we our service providers will have access to your device camera, audio and location with your consent. We do not collect any information through the accesses granted other than what is necessary for conducting video KYC and you can revoke the access once the verification process is complete.

iii. Event registrations and other form submissions:

We record information that you submit when you (i) register for any event, including webinars or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download or access/obtain any whitepaper, or other materials, (iv) participate in contests or respond to surveys, or (v) submit a form to request customer support, get a quote or to contact Mudhalpadi for any other purpose.

iv. Testimonials :

When you authorize us to post testimonials about our products and services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at privacy@zfpl.com.

v. Interactions with us:

We may record, analyze and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, for improving our interactions with you and other customers.

Information that we collect automatically

i. Information from browsers, devices and servers:

When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites.

ii. Information from cookies and tracking technologies:

We use temporary and permanent cookies to identify users of our services and to enhance user experience. We embed unique identifiers in our downloadable products to track usage of the products. We also use cookies, beacons, tags, scripts, and other similar technologies to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and for targeted visitor and user engagement by tracking your activities on our websites. In some instances, you have the option to disable cookies. However, if you do so, certain features of our websites or application may not work properly. We also use first-party Local Storage Objects (LSOs) such as HTML5 to store content information and preferences to provide certain features.

iii. Information from application logs and mobile analytics:

We collect information about your use of our products, services and mobile applications from application logs and in-house usage analytics tools, and use it to understand how your use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.

Information we collect from third parties

i. Signups using federated authentication service providers :

Our website may have federated authentication service providers such as LinkedIn, Microsoft and Google to help you sign up with Mudhalpadi. These services will authenticate your identity and give you the option to share certain personal information with us, such as your name and email address.

ii. Information from identity verification providers:

To help us provide you services, we engage certain third party service providers for identity verification, risk assessment, fraud detection and fraud prevention. We receive certain personal information about you such as name, , date of birth, direct or indirect political exposure, current and previous addresses, your company name, and permanent account number, contact details such as primary and other phone number(s), status of the phone number(s), carrier information, your credit information from such service providers when we set-up your account with us or process your loan application.

iii. Referrals:

If someone has referred any of our products or services to you through any of our referral programs, that person may have provided us your name, email address and other personal information. You may contact us at privacy@zfp.com to request that we remove your information from our database. If you provide us information about another person, or if another person gives us your information, we will only use that information for the specific reason for which it was provided to us.

iv. Information from our third party service providers:

If you contact any of our third party service providers such as our partners, banking correspondents, and direct selling agents, or otherwise express interest in any of our products or services to them, the third-party service providers may pass your name, email address, company name and other information to Mudhalpadi. If you register for or attend an event that is sponsored by Mudhalpadi, the event organizer may share your information with us. Mudhalpadi may also receive information about you from review sites if you comment on any review of our products and services, and from other third-party service providers that we engage for marketing our products and services.

v. Information from social media sites and other publicly available sources:

When you provide feedback or reviews about our products, interact, or engage with us on marketplaces, review sites or social media sites such as Facebook, Twitter, LinkedIn and Instagram through posts, comments, questions and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our services and products, better understand user reactions and issues, or to reproduce and publish your feedback on our websites. We must tell you that once collected, this information may remain with us even if you delete it from these sites. Mudhalpadi may also add and update information about you, from other publicly available sources.



vi. Other sources:

We will collect certain information about you such as your bank account information and other payment details from the recovery agents we engage for the recovery of the loans. In addition to this, we will collect your information from other sources such as credit bureaus, Central KYC Records Registry (CKYCR), digilocker, and other verification authorities .

Purposes for Collecting and using your Information

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To provide you the services of Mudhalpadi (including but not limited to setting up and maintenance of your account, processing your loan applications, and extending loans);
- To verify your identity, credit worthiness, and for detection and prevention of fraudulent transactions or activities;
- To comply with any legal requirements that apply to Mudhalpadi (including but not limited to compliance with the requirements under "know your customer", anti-money laundering laws, or anti - terrorism laws).
- To understand how you use services of Mudhalpadi, to monitor and prevent problems, and to improve our service;
- To analyze trends, administer our websites, and track visitor navigations on our websites to understand what visitors are looking for and to better help them;
- To ask you to participate in surveys, or to solicit feedback on our services;
- To provide customer support, and to analyze and improve our interactions with you;
- To monitor and improve marketing campaigns and make suggestions relevant to you.
- To communicate with you (such as through email) about Mudhalpadi, changes to this Privacy Policy, terms of service or other important notices.

Who we share your information with?

Employees and independent contractors : Employees and independent contractors of Mudhalpadi have access to your information on a need-to-know basis. We require all employees and independent contractors to follow this Privacy Policy for personal information that we share with them.

Identity verification providers and credit bureaus: We may need to share some of your personal information that you provide to us with third-party identity verification service providers and credit bureaus to help us verify your identity, assess your credit worthiness and to detect and prevent fraud. These service providers are required to use your personal information in accordance with applicable data protection and privacy laws.

Third-party service providers : We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as group entities of Zoho, partners, direct selling agents, banking correspondents, , marketing and advertising partners, event organizers, video KYC providers, and authorized payment institutions. These service providers are authorized to use your personal information only as necessary to provide the services to us.

Disclosure in compliance with legal obligations: We may be required by law to disclose your personal information to comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements. We are required to submit your KYC records to the CKYCR and we may also share your personal information with Financial Intelligence Unit - India (FIU-IND), in case you make any suspicious transactions and with the authorized Information Utility registered with Insolvency and Bankruptcy Board of India (IBBI), in the event of failure to make any repayment of secured loans.

Other cases: We may disclose information to a third party if we believe that such disclosure is necessary for preventing fraud, spam filtering, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our customers.

Your rights with respect to the information we hold about you

You have the following rights with respect to the information we hold about you:

Right to access: You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.

Right to rectification: You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

Right to erasure: You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

Right to withdraw consent: Where we rely on your consent for processing your information, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Right to complain: You have the right to complain to the appropriate supervisory authority if you are not satisfied with how we have resolved your grievances against the way we collect, use or share your information.

Right to nominate: You have the right to nominate any other individual, who shall, in the event of your death or incapacity, exercise the above mentioned rights.

You can contact us at privacy@zfpl.com for exercising any of the rights mentioned above.

Your choice in information use

Opt out of non-essential electronic communications : You may opt out of receiving newsletters and other non-essential messages by using the 'unsubscribe' function included in all such messages. However, you will continue to receive essential notices and emails such as account notification emails (password change, renewal reminders, etc.), security incident alerts, security and privacy update notifications, and essential transactional and payment related emails.

Optional information : You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

How secure is your information

At Mudhalpadi, we take data security very seriously. We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of your information.

Grievance officer

We have appointed a Grievance Officer to oversee our management of your personal information in accordance with this Privacy Policy. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Grievance officer by sending an email to grievance@zfpl.com or by writing to: Grievance Officer, 942, Krisp IT Park, Vandalur Kelambakkam Road, Kizhaottaiyur Village, Vandalur Taluk, Chengalpattu, Tamil nadu – 600127.

External links on our websites

Some pages of our websites may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any personal information with these third parties unless you have checked their privacy policies and assured yourself of their privacy practices.

Blogs and forums

We offer publicly accessible blogs and forums on our websites. Please be aware that any information you provide on these blogs and forums may be used to contact you with unsolicited messages. We urge you to be cautious in disclosing personal information in our blogs and forums. We are not responsible for the personal information you elect to disclose publicly. Your posts and certain profile information may remain even after you terminate your account with Mudhalpadi. To request the removal of your information from our blogs and forums, you can contact us at privacy@zfpl.com.

Business Transfers

We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honor our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in the uses of your personal information. We will also notify you about any choices you may have regarding your personal information.

Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or the manner in which your personal information is used, kindly write to us privacy@zfpl.com. We will contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes

We may modify the Privacy Policy at any time, upon notifying you. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes. Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy. You will not receive notification of minor changes to the Privacy Policy. Further you will not receive any notification of changes to the Privacy Policy if you have not verified your email address. If you are concerned about how your personal information is used, you should check back at our website periodically.