

PRIVACY POLICY

DSP FINANCE PRIVATE LIMITED

(Formerly known as DSP Investment Managers Private Limited)

Version	Description	Prepared By	Approved By
1.0	Policy Formation	Priya Ranjit	Board of Directors on November 11, 2024
1.1	Policy Amendment	Sahib Pahwa	Board of Directors on June 27, 2025

Table of Contents

1. Overview.....	3
2. General Definitions.....	3
3. What is the purpose of this Privacy Policy?	3
4. Where is this policy applicable?	4
5. What is the scope of this policy?	4
6. What Privacy Principles does DSP Finance rely on?	5
7. What information do We collect from You?	5
8. What are Your rights?	6
9. How do We use Your Information?	6
10. Do We disclose Your Information?	7
11. Do We collect Financial SMS Information?.....	9
12. Our use of cookies	10
13. Blocking IP Addresses.....	10
14. How do We secure Your Information?.....	10
15. How can You help Us protect Your Information?	11
16. Referrals	11
18. Testimonials.....	11
19. How long do We retain Your information?	12
20. Changes to the Privacy Policy	12
21. Severability	12
22. Limitation of Liability.....	12
23. Contact Us.....	13
24. Grievance Officer.....	13
25. Enforcement.....	13

1. Overview

DSP Finance Private Limited (“**DSP Finance/We/Us/Our**” which expression shall mean and include its affiliates, successors and permitted assigns) takes the privacy of its customers, or any other person visiting its offices or using any website, connected webpages or its subdomains, portal/s, application/s or other platform/s provided by DSP Finance or availing the products and services offered by DSP Finance (“**User/You/Your**”), very seriously and is committed to protecting Your personal data. This privacy policy (“**Privacy Policy**”) outlines DSP Finance’s commitment to protecting the personal data of its employees, customers, and other stakeholders in accordance with applicable privacy laws and regulations. The Privacy Policy sets out how Your personal data is collected, used, stored, disclosed, transferred and shared by Us, ensuring transparency and respect for individuals’ privacy rights. This policy establishes procedures for safeguarding personal information, managing data breaches, and ensuring that data subjects can exercise their rights. Adherence to this policy helps the organization maintain trust, reduce the risk of privacy violations, and comply with legal and regulatory obligations.

DSP Finance urges You to read this Privacy Policy carefully before You use this application or Our other platforms, use or opt to access any services of DSP Finance or decide to part with any Information (as defined below) to DSP Finance.

This privacy policy shall be read in conjunction with the **Terms of Use** ([Terms and Conditions](#)) agreed by you while registering on www.dspfin.com for availing its service

2. General Definitions

Reference to “You” or “Your” in this Privacy Policy refers to any natural person (including the employees of DSP Finance) who provides to DSP Finance any information referred to in Schedule 1 of this document or any User(s) of DSP Finance website or business applications or other digital channels, whether or not the User avails the services offered by DSP Finance.

“Act” shall mean the Information Technology Act, 2000 and Rules thereunder as amended from time to time.

“Information” shall mean and include Personal Information / PI and Sensitive Personal Data or Information / SPDI as may be collected by DSP Finance.

“Personal Information” or “PI” shall have the same meaning as under Rule 2(i) of the Rules. For ease of reference, Rule 2(i) of the Rules is reproduced under Schedule 1.

“Rules” shall mean the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.

“Registered User” shall mean such user whose registration is accepted by DSP Finance.

“Sensitive Personal Data or Information” or “SPDI” shall mean and include information under Rule 3 of the Rules. For ease of reference, Rule 3 of the Rules is reproduced under Schedule 1.

This Privacy Policy is published in compliance with the provisions of applicable law, including the Act, Rules and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 that require publishing the Privacy Policy on DSP Finance website and other digital channels.

3. What is the purpose of this Privacy Policy?

- 3.1. This Privacy Policy outlines DSP Finance’s approach to handling Your personal data responsibly and transparently. It aims to protect Your privacy rights by ensuring that personal information is collected, processed, stored, and shared in compliance with relevant data protection laws and regulations.

- 3.2. This policy sets out DSP Finance's commitment to safeguarding personal data, promoting trust, and providing clear guidance on how individuals can exercise their privacy rights.
- 3.3. This Privacy Policy describes the information that We collect from You, how We collect this information (directly or through third parties or which is automatically generated, when You interact with DSP Finance Portals (as defined below) and what We do with it after We collect it.

4. Where is this policy applicable?

- 4.1. This policy is applicable to the website of DSP Finance at <https://dspfin.com/>, connected webpages or its subdomains, Our mobile application, and any other linked pages, products, software, features or other application services or digital channels, presently or in the future, offered and managed by DSP Finance ("DSP Finance Portals"), having its registered office at 11th Floor, Mafatlal Centre, Nariman Point, Mumbai - 400021.
- 4.2. The DSP Finance Portals are an online lending platform for users to avail financial services. DSP Finance is committed to protecting and respecting Your privacy.

5. What is the scope of this policy?

- 5.1. This Privacy Policy is an electronic record in the form of an electronic contract formed under the Act.
- 5.2. This Privacy Policy is a legally binding document between You and DSP Finance. The terms of this Privacy Policy are effective upon Your acceptance of the same by clicking on the "I Accept" checkbox or by continuing to use the DSP Finance Portals.
- 5.3. This Privacy Policy will govern the relationship between You and DSP Finance for Your use of the DSP Finance Portals. By accessing or using the DSP Finance Portals, You acknowledge that You have read and understood this Privacy Policy. Where required by applicable law, DSP Finance will seek Your explicit consent before processing Your personal data.
- 5.4. We recommend You review Our Privacy Policy from time to time because Your use of DSP Finance Portals, Our products and Our services means Your acceptance of the prevailing Privacy Policy, including any amendments thereto.
- 5.5. DSP Finance Portals are not intended for use by children and minors. Parents are requested to ensure that personal information is not provided by minors.
- 5.6. By clicking on the "I Accept" checkbox, You expressly consent to DSP Finance collecting, maintaining, using, processing and disclosing Your Sensitive Personal Data or Information and other Information in accordance with the terms set out in this Privacy Policy. If You do not agree with this Privacy Policy in its entirety, You agree to not use DSP Finance Portals and any products and/or services provided by DSP Finance on it. If You have any questions or comments regarding this Privacy Policy, please contact Us at support@dspfin.com.
- 5.7. By clicking on the "I Accept" checkbox, You authorize Us to contact You even if You are registered with DND/NDNC registry.
- 5.8. You may be able to access third party websites directly from the relevant DSP Finance Portal. This Privacy Policy is limited to DSP Finance and DSP Finance Portals and the disclosure and use of data collected by Us.
- 5.9. If You visit any third party websites through the links on the DSP Finance Portals, We recommend You properly review the privacy policies of each of those websites. Their data collection practices and their policies might be different and DSP Finance does not have control over any of their policies and DSP Finance disclaims all responsibility or liability with respect to these policies or the websites.

6. What Privacy Principles does DSP Finance rely on?

DSP Finance is committed to keeping Your Information secure. In order to maintain the confidentiality of Your Information, We maintain, amongst others, the following privacy principles:

- We only collect Information that is relevant and required to meet regulatory compliances in relation to KYC and CDD requirements, assess Your demographic profile, Your financial abilities, conduct Our business or provide You with the relevant product or service.
- We process Your Information to provide You with better customer service, browsing experience and the relevant product or service.
- Unless prohibited by laws and regulations, We may disclose Your Information to Our affiliates or to agents or third-party service providers appointed by Us in order to provide You with a better customer service and / or the relevant service and products. Notwithstanding the above, Your Sensitive Personal Data or Information will only be disclosed with Your explicit consent.
- We may disclose Your Information to the Government, governmental entities or regulatory agencies as required by law, but We will only do so under proper authority.
- We maintain strict security systems designed to prevent unauthorized access to Your Information by anyone, including Our employees, affiliates, agents or appointed third party service providers.

7. What information do We collect from You?

7.1. During Your use of the DSP Finance Portals, We will collect certain Information from You, including:

- Information that You provide to Us while interacting with Us, such as Your name, gender, date of birth, mobile number, password, email address, mailing address, telephone number, Aadhar card details, PAN number, PAN, sales tax details, service tax details, bank account details, business financials, passport number, driving license number, purpose of loan, sources of Your income and family income;
- demographic information like residential address and office address, salary slips, Your family details;
- information relating to income or mutual funds/shares and expenses obtained through bank SMS scraping and through integration with such service providers;
- credit related information that is collected from other sources like the credit bureau;
- information collected through KYC;
- information that You provide when You write directly to Us (including by e-mail) or provide Us over telephone;
- any other information that DSP Finance is required to collect as per a specific mandate from any bank or as a requirement under applicable law; and
- other relevant information as DSP Finance may deem fit, subject to applicable laws.

7.2. We also collect non-sensitive data from You, such as:

- browser type,
- the URL of the previous website You visited,
- information about the pages viewed on the website,
- how You navigate through the website and interact with webpages etc.,
- your ISP,
- operating system types, clickstream patterns, and
- Your Internet protocol (IP) Address.
("Non-Sensitive Personal Data or Information").

7.3. While Personal Information is capable of identifying You, Non-Sensitive Personal Data or Information collected by us may not, in isolation, identify You or Your computer resource and may be processed in aggregated or anonymised form.

7.4. We also contract with several online partners to help manage, monitor and optimize DSP Finance Portals and any services provided by Us and to help Us measure the effectiveness of Our advertising,

communications and how visitors use DSP Finance Portals. To do this, We may use web beacons and cookies.

- 7.5. In addition to collecting information via DSP Finance Portals, We may also conduct a site visit to collect Information and obtain Information and external data used by lenders to process applications and complete and manage transactions, e.g., from credit reporting agencies and other vendors, as well as from social media.
- 7.6. There is certain Information that We collect automatically as the result of Your use of DSP Finance Portals, or through the use of web analytics services. This Information includes but is not limited to:
 - the Internet Protocol (IP) address of the device from which You access the DSP Finance Portals (this can sometimes be used to derive the country or city from which You are accessing the DSP Finance Portals);
 - the specific actions that You take on the DSP Finance Portals, including the pages that You visit, connecting Your Facebook or Google+ account;
 - the time, frequency and duration of Your visits to the DSP Finance Portals;
 - Your browser type and operating system; and
 - the nature of the device from which You are accessing the DSP Finance Portals, for example, whether You are accessing the DSP Finance Portals from a personal computer or from a mobile device.
- 7.7. A one-time access may be taken for camera, microphone, location or such other information as may be necessary for the purpose of onboarding with Us or as may be required pursuant to any regulatory or statutory requirement.

8. What are Your rights?

- 8.1. You may, at any time, not provide DSP Finance with the Information that DSP Finance seeks to collect.
- 8.2. Even after You have provided DSP Finance with any Information, You may withdraw the consent given earlier by writing to Us at support@dspfin.com.
- 8.3. In such cases, DSP Finance reserves the right to not provide or discontinue the provision of any product or service or DSP Finance Portal that is linked with such Information.
- 8.4. You have the right to request for access to Your Information and to review and amend such Information.
- 8.5. You have the option to 'opt-out' of all DSP Finance newsletters and other general e-mail marketing communications by way of links provided at the bottom of each mailer. DSP Finance respects Your privacy and in the event that You choose to not receive such mailers, it shall take all adequate steps to remove You from such lists. However, You will not be able to opt-out of receiving administrative messages, customer service responses or other transactional communications.

9. How do We use Your Information?

- 9.1. Any Information shared by You is used by Us and/or Our authorized third parties/service partners/lending partners of DSP Finance to support Your interaction with Us, to offer You services in the best possible manner and to contact You again about other services and products that We offer and/or the services and products offered by Our authorised third parties/service partners/lending partners which may be beneficial to You, including:
 - to capture, save, compile and analyse the Information required to perform credit and risk scoring models and establish identity and assess applications;
 - to design and improve the products and services, and customer relationship management processes to operate the business;
 - to carry out market research so that We can improve the products and services We offer and to monitor metrics such as total number of views, visitors, traffic and demographic patterns;

- for fraud screening and prevention purposes and to protect DSP Finance's legal rights and comply with DSP Finance's legal obligations;
 - to administer and provide products and services You request or have expressed an interest in;
 - to carry out contractual obligations entered into between DSP Finance and you;
 - for record keeping purposes and to conform to the legal requirements, compliance/reporting to administrative and judicial authorities, as may be required under law and to comply with regulatory guidelines;
 - to create an individual profile for You so that We can understand and respect Your preferences;
 - to personalize and improve Your experience on DSP Finance Portals and allow You to utilize DSP Finance Portals' features by granting DSP Finance access to information from Your device;
 - for profiling purposes to enable Us to personalize and/or tailor any marketing communications that You may consent to receive from us;
 - to protect and defend the rights or property of the website owners of DSP Finance, or Your rights;
 - to communicate with You in order to send order confirmations, respond to customer service requests, send marketing communications, and send account update notifications;
 - to communicate with You in the event that any products or services You have requested are unavailable;
 - to inform You about important details like DSP Finance's digital platforms, change in terms, conditions and policies and /or other administrative information important to meet Your interests;
 - to share the Information with multiple financial institutions/ lending partners of DSP Finance / authorised third parties / service partners and other lenders for customization of offers and provision of services by DSP Finance and/or services and products offered by authorised third parties/ service partners/ its lending partners;
 - to undertake research, troubleshooting, fraud and risk management and prevention of other criminal activity;
 - to post and review Your comments on Our blog;
 - to manage Your employment and related compliances, process payroll and other compensations, manage employee benefits, track attendance, etc.;
 - to address Your requests and queries and manage Your relationship with DSP Finance;
 - for security and business continuity and risk management; and
 - for system or product development and planning, audit and administrative purposes.
- 9.2. When You sign up with Us for an online account, register to receive marketing communications from us, fill in one of Our forms (whether online or offline) or otherwise expressly provide Us with Your personal data, We may collect and store any personal data that You provide to Us and may use it to personalize and improve Your experience on DSP Finance Portals, provide products and services You request from us, and carry out profiling and market research.
- 9.3. We will take utmost care to ensure that Your Information is not shared with the public and that Your transactions on the DSP Finance Portals are confidential. If We use any third parties for any of these transactions, We will also make sure that confidentiality is maintained. We may also provide Information about Our customers to other organizations. We will take reasonable care that any Information We disclose to them is only used for the specific task We ask them to perform.
- 9.4. When sharing Information with third-party processors, we ensure they operate under strict confidentiality agreements and implement security safeguards equivalent to Ours to protect personal data.
- 9.5. We want You to be the first to know about new products and services, and occasional offers from Our partners. We may share these offers with You only with Your prior consent. You can unsubscribe from receiving these offers by emailing us. However, if You don't choose to receive this information, We will be unable to keep You informed of new services, products, events or special offers that may interest you.

10. Do We disclose Your Information?

10.1. DSP Finance does not sell Your information to third parties. DSP Finance may collect/share/retrieve Your information with/from the following third parties for customer verification, personalization of products and

services, credit rating, data enrichment, marketing or promotion of the products or services of DSP Finance, processing of loan, regulatory reporting etc.

S. No.	Third Party Is this table mandatorily required ?	Purpose
1.	Salter Technologies Pvt. Ltd.	It provides end-to-end technology services to DSP Finance Pvt. Ltd.
2.	Computer Age Management Services Limited (CAMS)	Mutual fund transfer agency - provides pledging & unpledging services
3.	Kfin Technologies Limited (Kfintech)	Mutual fund transfer agency - provides pledging & unpledging services
4.	Yes Bank Limited	It provides banking services to DSP Finance.
5.	Cashfree	Payment Aggregator provider for all disbursements
6.	Razorpay	Payment Aggregator provider for all collections
7.	Gupshup	SMS service provider for DSP Finance
8.	Sendgrid	Email service provider for DSP Finance.
9.	Transunion CIBIL Limited/ Experian/ CRIF/ Equifax	For fetching and reporting bureau details
10.	Screenza/ Trackwizz	AML/ PEP screening
11.	Signzy	PAN Card Verification and Document signing + stamp paper procurement
12.	Digio	Mandate registration & Presentations
13.	Finflux	It provides LMS services to DSP Finance
14.	Decentro	It provides CKYC services to DSP Finance
15.	Leegality	It provides document signing & stamping services to DSP Finance.
16.	Exotel	It provides telephony services (customer support) to DSP Finance
17.	Vilpower	It provides DLT/ SMS service to DSP Finance
18.	MF Central	Mutual fund transfer agency - provides pledging & unpledging services

19.	CDSL/ NSDL	Securities transfer agency - provides pledging & unpledging services
20.	Accord Fintech Pvt. Ltd.	Market data provider - Equity pricing, corporate actions and valuation inputs for LAS RMS/LTV monitoring

10.2. DSP Finance may invite selected third parties to participate in offers We feel would be attractive for Our Users. DSP Finance may also share Your information to provide You with superior services and a range of offers.

10.3. DSP Finance may contract with various third parties who help Us provide, maintain and improve DSP Finance Portals and the services or products provided by Us. DSP Finance may disclose Your Information to:

- any agent or third-party service provider who provides administrative, analytics, telecommunications, computer, payment or other services to DSP Finance in connection with the operation of its business;
- any other person under a duty of confidentiality to DSP Finance including an affiliate or group company of DSP Finance which has undertaken to keep such information confidential;
- credit reference agencies, and, in the event of default, to debt collection agencies;
- any person to whom DSP Finance is under an obligation to disclose the Information under the requirements of any law which is binding on DSP Finance or any of its branches;
- any actual or proposed assignee of DSP Finance or participant or sub-participant or transferee of DSP Finance's rights in respect of the customer;
- governmental and other statutory bodies who have appropriate authorization to access the same for any specific legal purposes;
- in case DSP Finance is part of a merger, acquisition or amalgamation, to the relevant third party;
- comply with any legal obligation, or in order to enforce or apply the Terms and Conditions (as may be displayed on the Our website and other DSP Finance Portals), or to protect the rights, property or safety of DSP Finance, its Users or others. This includes exchanging information with other companies/agencies that work for fraud prevention and credit reference; and
- companies that provide products and services to Us in relation to employee management, such as payroll and benefits providers, pension providers, human resources service providers, recruitment agencies, compliance consultants, etc.

11. Do We collect Financial SMS Information?

- Our mobile application collects and monitors, and other DSP Finance Portals may collect and monitor, financial SMS sent by alphanumeric senders from Your inbox which helps Us in identifying the various bank accounts that You may be holding, cash flow patterns, description and amount of the transactions undertaken by You to help Us perform a credit risk assessment which enables Us to determine Your risk profile and to provide You with the appropriate credit analysis and offers.
- This process will enable You to take financial facilities from the regulated financial entities available on the DSP Finance Portals.\
- This financial SMS data also includes Your historical data. While using the application, it periodically sends the financial SMS information to Our affiliate's server and to us.
- As a part of Our mobile application loan journey, We require references from the loan applicant. In this regard, during filing the form on Our application, We collect and monitor customer Information such as contact information which includes name, phone number, account type, contact last modified and other optional data like relationship and structural address to enable You to autofill the data during the loan application process. This information is required for risk analysis, enabling Us to assess Your risk profile and determine Your loan eligibility.

12. Our use of cookies

- Cookies are small bits of information that are automatically stored on Your web browser that can be retrieved by the relevant DSP Finance Portal. Cookies allow web servers to recognize Your computer each time You return to DSP Finance Portals, including the date and time of visits, page view history, time spent at Our website and other DSP Finance Portals, and the websites visited just before and just after Our website and other DSP Finance Portals, verify Your registration or password information (in case of a Registered User) during a particular session so that You do not have to input Your password multiple times as You navigate the site and suggest products or services that may interest you.
- This information is collected on an aggregate basis and cannot personally identify you. We might also use other technology to track how You interact with DSP Finance Portals and employ some third-party agencies to use the data on Our behalf. We might also use this information to display advertising from third party companies.
- You may disable the cookies by changing the setting on Your browser. Most browsers will allow You to decline cookies however, this might affect service on some parts of Our website and other DSP Finance Portals.

13. Blocking IP Addresses

DSP Finance uses the help of Internet Protocol ("IP") addresses to diagnose any problems with its server and to administer DSP Portals including by blocking certain addresses that it feels are inappropriately using DSP Portals. IP addresses are used to gather broad demographics information, such as browser types, visitor's country, visiting frequency, operating systems, etc.

14. How do We secure Your Information?

- 14.1. We store and process Your Information on reputed web service cloud servers.
- 14.2. We protect Your Information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration.
- 14.3. Some of the safeguards We use are firewalls, data encryption using SSL in transit, data at rest and information access authorization controls.
- 14.4. However, You understand and accept that there is no guarantee that data transmission over the Internet will be completely secure and that any information that You transmit to Us is at Your own risk.
- 14.5. DSP Finance understands that securely storing data is important. DSP Finance has put in place procedures to deal with any suspected data security breach and will comply with the legal requirements in this regard. We store Information using industry standard, reasonable and technically feasible, physical, technical and administrative safeguards against foreseeable risks, such as unauthorized access. Any transactions that take place on DSP Finance Portals are processed through Our secure server to make every reasonable effort to ensure that Your Information is protected.
- 14.6. While DSP Finance Pvt Ltd strives to protect Your Information, it cannot ensure or guarantee that the Information or private communications You transmit to Us will always remain confidential, and You do so at Your own risk.
- 14.7. While no website, mobile application or other digital channels can guarantee security, We have implemented appropriate administrative, technical, and physical security procedures to help protect the Information You provide to Us as specified under applicable laws. We ensure that only authorized employees are permitted to access Information, and they only may do so for permitted business functions.
- 14.8. Subject to applicable laws, We assume no liability for any disclosure of Your Information due to transmission errors, unauthorized third-party access to DSP Finance Portals and Our databases or

other acts of third parties or acts or omissions beyond Our reasonable control and You shall not be entitled to hold DSP Finance responsible for any breach of security.

15. How can You help Us protect Your Information?

- 15.1. Both You and DSP Finance are responsible for protecting Your data against online fraud. You should be careful that Your bank account details and other related information, including Your user ID(s) and/or passwords/personal identification numbers (PIN) are not compromised by ensuring that You do not knowingly or accidentally share, provide or facilitate unauthorized use of it. Please do not share Your OTPs, user ID and/or password or allow access or use of it by others. We endeavour to put in place high standards of security to protect Your interests.
- 15.2. You should safeguard Your unique user ID(s) and Passwords/PINs by keeping them secret and confidential. Kindly never write them down or share these details with anyone. If a password is used to help protect Your accounts and Information, You are responsible for keeping Your password confidential. Do not share this information with anyone. If You are sharing a computer with anyone You should always log out before leaving the DSP Finance Portal or service to protect access to Your information from subsequent users.
- 15.3. Except in the course of a transaction done by You, DSP Finance will never ask You for Your passwords/PINs, to ensure that You are the only person who knows this information. When choosing Your unique User ID and password for the first time, do not create it using easily identifiable information such as Your birthday, telephone number or a recognizable part of Your name. If You think Your User ID and/or passwords/PINs have been disclosed to the third party are lost or stolen and unauthorized transactions may have been conducted, You are responsible for informing Us immediately.

16. Referrals

- 16.1. If You choose to provide a few referrals to introduce DSP Finance and/or DSP Finance Portals to any other person/ entity, We may ask You to provide such person/ entity's name and email address.
- 16.2. You agree and acknowledge that You will only provide such contact information after You have obtained consent for disclosing such personal information about the person/entity You refer to Us. DSP Finance will automatically send such person/entity an email inviting it to visit the DSP Finance Portal.
- 16.3. DSP Finance stores this Information to send this email and keep a record of the number of persons/entities referred by Our Users and may send additional emails to the said person/entity in connection with services offered by DSP Finance. Such person/entity may contact DSP Finance at support@dspfinc.com to request that this information be removed from DSP Finance database.

17. Update Personal Information:

DSP Finance encourages You to update Your Information as and when there are any changes. You are 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 , or request its deletion . However, DSP Finance shall not be responsible for the authenticity of the Personal Information or Sensitive Personal Data or Information supplied by You.

18. Testimonials

We may display personal testimonials of satisfied customers on DSP Finance Portals in addition to other endorsements with consent of the relevant User. If You wish to update or delete Your testimonial, You can contact Us by email at testimonials@dspfinc.com.

19. How long do We retain Your information?

- 19.1. All Personal Information collected by DSP Finance shall be retained for as long as You maintain an account or relationship with DSP Finance or its authorised third-party service providers ("Third Party Service Entities"), and for such additional period as may be required to provide services or to comply with applicable law or internal data retention policies.
- 19.2. Upon deactivation or termination of Your account or services, such Personal Information will cease to be used for providing services and shall be retained only for such period as may be required under applicable law or the relevant data retention policy, following which it may be deleted or anonymised
- 19.3. If You wish to cancel Your account or request that DSP Finance no longer use Your information to provide services, You may contact DSP Finance at support@dspfin.com.
- 19.4. DSP Finance will then delete the Information as per Your request, unless such Information has to be retained to comply with DSP Finance's legal obligations, resolve disputes, and for enforcing its agreements.
- 19.5. If You are no longer a User/customer/borrower of DSP Finance, We will not retain Your Information longer than is necessary for the purposes for which it was obtained, unless it is required to be retained under applicable law.
- 19.6. Notwithstanding the foregoing, DSP Finance may retain and use such information in an aggregated or anonymised form for analytics, research, and service improvement purposes, in a manner that does not identify You.

20. Changes to the Privacy Policy

- 20.1. DSP Finance may change or update this Privacy Policy from time to time and post the updated version of the policy on Our website and/or other DSP Finance Portals. DSP Finance will ensure to place a notice on the top of this page with the latest updated date. In case of any material changes to the Privacy Policy, You will be notified by email (sent to the email address specified in the Users' mail account) or by means of a notice on Our website and/or other DSP Finance Portal before the change becomes effective.
- 20.2. Users are encouraged to periodically review this page for the latest information on its privacy practices.
- 20.3. DSP Finance will endeavor to update You on an annual basis, or as prescribed under applicable laws, regarding changes to the Privacy Policy. However, any failure or delay by DSP Finance to update You of the changes to the Privacy Policy will not impact the validity and effectiveness of those changes.
- 20.4. Each time You access, use or browse the DSP Finance Portals, You signify Your acceptance of the then-current changes to the Privacy Policy applying to Your Information collected by us, on and from the effective date of such changes.

21. Severability

DSP Finance has made every effort to ensure that this Privacy Policy adheres to the applicable laws. The invalidity or unenforceability of any part of this Privacy Policy shall not prejudice or affect the validity or enforceability of the remainder of this Privacy Policy.

22. Limitation of Liability

Notwithstanding anything contained in this Privacy Policy or elsewhere but subject to applicable law, DSP Finance shall not be responsible for any loss, damage or misuse of Your Information, if such loss, damage or misuse is attributable to a Force Majeure Event.

A “Force Majeure Event” shall mean any event that is beyond the reasonable control of DSP Finance Pvt Ltd and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes, lockouts or industrial action of any kind, riots, insurrection, war, acts of government, pandemic, computer hacking, civil disturbances, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, and any other similar events not within the control of DSP Finance and which DSP Finance is not able to overcome.

23. Contact Us

If You have any questions about this Privacy Policy, please e-mail them to support@dspfin.com.

24. Grievance Officer

In case of any grievances with the actions of DSP Finance in relation to Your Information, You may contact the Grievance Officer at grievance.officer@dspfin.com.

25. Enforcement

Compliance with this policy is mandatory for all customers, employees, contractors, and third-party service providers. Violations may result in disciplinary actions, including suspension of access, termination, or legal action if applicable. All individuals are required to report any suspected breaches, and non-compliance will be thoroughly investigated, with corrective measures taken as needed. Adherence to this policy helps safeguard the organization’s information assets and ensures compliance with legal, regulatory, and contractual obligations.

Schedule 1

- Rule 2 (i) “Personal Information” 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 a body corporate, is capable of identifying such person.
- Rule 3 “Sensitive Personal Data Or Information” of a person means such personal information which consists of information relating to:- password; financial information such as Bank account or credit card or debit card or other payment instrument details; physical, physiological and mental health condition; sexual orientation; medical records and history; Biometric information; any detail relating to the above clauses as provided to body corporate for providing service; any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: Provided that, any information that is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.