



UNITY SMALL FINANCE BANK LIMITED

DATA PRIVACY POLICY

VERSION 1.0

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Document History:

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1.0	Compliance	Board of Directors	03-05-2023

DATA PRIVACY POLICY

Unity Small Finance Bank Limited (hereinafter referred to as '**the Bank**') takes your privacy seriously, is committed to protect your personal information and assures that the information made available to the Bank will be safely maintained.

The Bank will use its best efforts to prevent inadvertent disclosure of your personal information to unauthorized personnel or to any other third-party vendor. The Bank will not publish any personal information provided by you.

This Data Privacy Policy sets out the way in which the Bank collects, uses, shares, discloses, transfers, and disposes your personal information when you use the Bank's website or other digital platforms and their sub-domain/ custom extensions (i.e., applications such as, but not limited to, applications for digital lending, mobile applications of the Bank as also information/ data provided through API based mechanism).

You are advised to read the Privacy Policy before navigating the Bank's website and other digital platforms.

Please note that the Bank's website and other digital platforms may contain links to third-party vendor websites and other digital platforms which are provided for your convenience. While the Bank shall be responsible for the privacy practices and security of the information that you share with the Bank, the Bank urges and recommends that you refer to the privacy policy of the websites/ other digital platforms that you visit.

COLLECTION AND USE OF PERSONAL INFORMATION

Personal information is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly using identifier such as, but not limited to, name, contact details, identification number or location data.

Personal information may also include Sensitive Personal Data or Information (SPDI) which consists of information relating to password, financial information such as bank account or credit card or debit card or other payment instrument details, etc.

Your personal information will be collected on need-to-know basis to provide products or services as requested by you. The Bank will obtain your explicit written consent where necessary prior to processing your personal information. The Bank shall maintain audit trail of such consent provided by you.

The Bank may supplement the personal information that you provide with other information obtained from the Bank's dealings with you or which the Bank receives from other organizations, such as, the Bank's lending service providers and other third-party vendors.

Please note, if you do not choose to provide the Bank with the requested personal information, the Bank will be unable to offer you products or services.

The Bank will use your personal information for lawful purposes, including the following:

- to administer and provide products and services you request or have expressed an interest in and to communicate with you in respect thereof.
- to share with third parties who are also involved in administering and providing products or services you request or have expressed an interest in.
- to communicate with you in the event that any products or services you have requested are unavailable.
- to update you and make subsequent offers about other relevant products and services that may be of your interest.

- for fraud screening and prevention purposes.
- for record keeping purposes.
- for authenticating the Aadhaar number holder.
- to carry out market research and get feedback so that the Bank can improve the products and services offered.
- to track your activity on the Bank's digital platforms.
- to create an individual profile for you so that the Bank can understand and respect your preferences.
- to personalize and improve your experience on the Bank's digital platforms.
- to personalize and/ tailor any communications that the Bank may send you.
- for profiling purposes to enable the Bank to personalize and/or tailor any marketing communications that you may consent to receive from the Bank.
- fulfilling any regulatory or legal requirements applicable to the Bank.

When the Bank provides you with products or services or where you register with the Bank your interest in the Bank's products or services, the Bank may collect and store your personal information, for example, when you sign up for an online account, register to receive marketing communications from the Bank/ Group Companies (and/ or from our lending service providers and third-party vendors), fill in one of our forms (whether online or offline) or otherwise provide the Bank with your personal information for purposes listed above.

When you interact with the Bank's digital platforms, the Bank may also automatically collect the following information about your visit. This is primarily to understand how you use the Bank's digital platforms and to create more relevant communications:

- how you have reached the Bank's digital platform and the internet protocol (IP) address you have used.
- your browser type, versions and plug-ins, and your operating system.
- your journey through the Bank's digital platform, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information.
- what content you like or share.
- which adverts you saw and responded to.
- which pop up or push messages you might have seen and responded to.
- your subscription status.
- information collected in any forms you complete.

The Bank may also infer your location from the IP address you have used to access the Bank's digital platforms and the Bank may analyze which marketing activity led to your taking specific action on the Bank's digital platforms (e.g., downloading the app).

The Bank's applications may require one-time access to your mobile phone resources such as camera, microphone, location, or any other facility necessary for the purpose of on-boarding/ know-your-customer (KYC) requirements. Such access shall only be obtained after seeking your consent. However, the Bank shall ensure that the applications desist from accessing resources on your mobile phone such as, file, media, contact list, call logs, and telephony functions.

Further, the Bank shall not collect/ store your biometric information in the systems associated with the Bank's applications or the Bank's third-party vendor applications unless permitted under applicable law.

The Bank shall ensure that our applications or our third-party vendors engaged to provide products/ services to you will not store your personal information except such information (such as, but not limited to, name, address, contact details) that may be required to carry out operations.

The Bank shall enable you with an option not to provide the information sought to be collected, provide, or deny consent (in written) for use of specific personal information, restrict disclosure to third-party vendors and to revoke consent already granted at the time of collecting personal information.

The Bank shall share the purpose of collection of personal information every time the Bank seeks your consent.

You are responsible for providing the Bank with accurate and complete personal information. Please notify the Bank of any changes to your personal information.

SHARING YOUR PERSONAL INFORMATION

The Bank may share your personal information with associated third-party vendors/ business partners after obtaining your consent, except where such disclosure has been agreed to in the contract between you and the Bank or the sharing is required as per statutory or regulatory requirement. Such third-party vendors may process personal information on the Bank's behalf as necessary, in connection with providing the Bank's products and services, fulfilling contractual arrangements and legal or regulatory requirements.

The Bank requires that the third-party vendors protect your personal information, only process it for the purposes it was shared for and not disclose it further.

The Bank may share your personal information with:

- law enforcement or government authorities where they have followed due legal process to request the Bank to disclose the information.
- third-party vendors who provide services.

List of lending service providers (LSPs) & digital lending applications (DLAs) and collection & recovery agents authorized by the Bank to process personal information can be accessed on the website of the Bank.

TRANSFER OF PERSONAL INFORMATION

The Bank may transfer your personal information to any of its associated entities/ group companies in India that ensures the same level of information protection that is adhered to by the Bank itself. The transfer shall take place only if it is necessary for the performance of the lawful contract between you and the Bank, or where you have consented to the transfer of your personal information.

LOG AND RECORD RETENTION OF PERSONAL INFORMATION

In accordance with applicable laws/ regulatory requirements and internal policies/ contractual obligations, the Bank shall retain your personal information for the period necessary to fulfill the lawful business purposes outlined in this Privacy Policy unless a longer retention period is required or is permitted by law/ regulatory body.

If the retention of customer information is not required, we have deployed policies and procedures to destroy or delete such customer information on a best effort basis. The Bank shall dispose personal information using secure destruction mechanism only.

COOKIES

In common with many other website operators, the Bank uses standard technology called ‘cookies’ on its website. Cookies are small pieces of information that are stored by your browser on your computer’s hard drive, and they are used to record how you navigate the Bank’s website on each visit.

The Bank automatically collects and temporarily stores the following information about your visit:

- the name of the domain you use to access the Internet;
- the date and time of your visit;
- the pages you visited; and
- the address of the web site you came from when you came to visit

The Bank uses this information for statistical purposes and to help make the Bank’s site more useful to visitors. Unless it is specifically stated otherwise, no additional information will be collected about you.

SAFEGUARDING YOUR PERSONAL INFORMATION

The Bank takes reasonable precautions to keep your personal information secure and require any third-party vendors that handle or process your personal information for the Bank to do the same. Access to your personal information is restricted to prevent unauthorized access, modification, or misuse.

The Bank shall manage security breaches that impact personal information as per the Bank’s incident management processes.

All personal information that the Bank collects shall be stored in servers located in India as per the local regulatory requirement.

YOUR PRIVACY RIGHTS

The Bank shall provide you with reasonable access to view and review your personal information and request correction and deletion where appropriate. In order to protect your privacy, the Bank shall take reasonable steps to verify your identity before granting access to your personal information.

You have the right to tell the Bank if you:

- do not want to be contacted by the Bank in the future
- would like a copy of the personal information which the Bank holds about you
- would like to delete your personal information from the Bank’s records (including the Bank’s applications and applications of third-party vendors used to provide services to you)
- wish to report any misuse of your personal information
- would like to correct or update your personal information

HANDLING PRIVACY CONCERNS

To exercise your privacy rights or in case you have any questions about this Privacy Policy or the Bank’s data privacy practices or to report any grievances, then please reach out at care@unitybank.co.in.

Grievance redressal shall be carried out at the earliest and in accordance with the grievance redressal policy of the Bank. The escalation matrix for redressal of grievances is available on the website of the Bank.

UPDATES TO OUR PRIVACY POLICY

The Bank may amend the Privacy Policy from time to time and post the updated version of the same on the Bank's website. The Bank encourages you to visit the Bank's website periodically and stay informed about how the Bank uses your personal information.