

NABFINS LIMITED

PRIVACY POLICY

Introduction:

"NABFINS is a subsidiary of NABARD, the company registered as NBFC MFIs in the mid-2000. Entrusted with the responsibility of promoting the microfinance sector besides scaling up SHG-Bank Linkage NABARD thought it fit to form a Micro Finance institution on a pilot basis with the objective of developing it as a model NBFC in the country which will facilitate setting up of benchmarks and standards for the MFI sector. NABFINS provides microfinance and other financial services to the needy and disadvantaged sections of the society for securing their prosperity in rural, semi-urban, and urban areas. NABARD, an apex development, a financial institution in our country had pioneered the world's largest microfinance movement called the SHG Bank Linkage program. NABFINS as a subsidiary of NABARD shall evolve into a model microfinance Institution to finance SHGs and JLGs and to set standards of governance among the MFIs, operate with exemplary levels of transparency, and extend its outreach to the needy, directly or through Business correspondents and Business Facilitators.

Customer's privacy is important to NABFINS LIMITED (hereinafter referred to as the NABFINS) and we are committed to protecting your privacy when you use NABFINS's Digital Platforms. This document will explain the process on how your data will be collected, used, shared, and safeguarded when you use our Digital Platforms, such as website, mobile app etc.

By using our Digital Platforms, you are expressly agreeing to and consenting to the terms of this privacy policy and is deemed to have given your consent for the processing of your Personal Data as set out in this Statement.

Welcome to nabfins.org ("Website", "we", "our", or "us"). We value your privacy and are committed to protecting the personal information you share with us through our website.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website or use of our mobile app.

DEFINITIONS

"Aadhaar" means the unique identity number issued to individuals by the Unique Identification Authority of India (UIDAI) under the Aadhaar Act, 2016.

"Company" or "NABFINS" or "we" or "us" or "our" refers to NABFINS LIMITED.

"Customer" or "Data Principal" or "you" or "your" refers to any natural person whose personal data is being processed by the Company.

"Data Breach" means any unauthorized access, use, disclosure, modification, or destruction of personal data that compromises the security, confidentiality, or integrity of personal data.

"Data Processing Agreement (DPA)" means a written agreement between the Company and third-party service providers governing the processing of personal data on behalf of the Company.

"Digital Personal Data" means personal data in digital form collected online or offline data that has been subsequently digitized.

"Personal Data" means any data about an individual who is identifiable by or in relation to such data and includes sensitive personal information.

"Processing" includes collection, recording, organization, structuring, storage, adaptation, retrieval, use, disclosure, erasure, or destruction of personal data.

"Third Party" means any person, company, or entity other than the Company or the Data Principal.

APPLICABILITY

This Privacy Policy applies to all users, customers, and visitors who access or use NABFINS's services, websites, mobile applications, and digital platforms. The policy governs the collection, processing, storage, and sharing of personal data in connection with all our agricultural and related services. This policy is applicable to all data processing activities conducted by NABFINS within India and extends to any personal data collected from users regardless of their geographic location when using our services. The policy takes effect immediately upon accessing our services and supersedes any previous privacy policies. Certain third-party services integrated with our platform may have separate privacy policies, and users are advised to review those policies independently.

EXPRESS CONSENT:

The Company shall refrain from accessing mobile device resources including files, media, contact lists, call logs, telephony functions, and other device features during digital lending operations. Such access shall be permitted only when operationally essential for delivering financial services to customers or when customers have provided explicit consent for such access. This policy ensures compliance with regulatory data privacy requirements while maintaining necessary functionality for legitimate service delivery. The Company commits to minimal and purpose-limited access to mobile device resources, prioritizing customer privacy and data protection.

WITHDRAWAL AND DEEMED CONSENT:

Customers may withdraw their consent at any time by contacting us, however, such withdrawal may limit our ability to provide certain services, affect processing of loan applications or existing accounts, and impact access to digital features. Withdrawal of consent will not affect the lawfulness of processing conducted prior to withdrawal, and NABFINS may continue to process and retain customer information where required by applicable laws or regulations. In certain circumstances, as permitted by applicable law, NABFINS may process customer information based on deemed consent, particularly for compliance with legal and regulatory obligations, prevention of fraud and ensuring transaction security, and credit assessment and risk management activities. Customer will be advised to keep in view these implications before withdrawing consent, as it may significantly impact customers' ability to access our financial services and products.

DATA SHARING AND DISCLOSURE

Internal Sharing

Within NABFINS, customer information is accessible only to authorized personnel who require it for:

- Loan processing and credit assessment
- Customer service and support
- Risk management and compliance
- Product development and analytics
- Audit and regulatory reporting

External Sharing

• The Company may share customer information with authorized service providers including technology vendors, cloud service providers, payment processors, collection agencies, legal and professional service providers, and marketing agencies to facilitate seamless service delivery and operational efficiency. Information sharing extends to financial partners such as co-lending partners, NBFCs, insurance companies for loan protection, credit guarantee organizations, investment partners, and credit rating agencies as required for comprehensive financial service provisioning.

• Regulatory and statutory sharing includes disclosure to RBI, NABARD, other financial regulators, Credit Information Companies (CICs), government departments for scheme benefits, tax authorities, and statutory auditors to ensure full compliance with applicable laws and regulations.

• For marketing, research, or non-mandatory purposes, the Company will obtain explicit customer consent before sharing, provide clear opt-out mechanisms, ensure that partner organizations maintain equivalent privacy standards, and limit information sharing to specific, clearly defined purposes with transparent communication to customers about the scope and intent of such sharing activities.

THIRD-PARTY SITES AND SERVICES

NABFINS engages with third-party service providers to support operations, including technology partners, financial institutions, credit bureaus, and regulatory authorities. All service agreements with third parties who process personal data on our behalf include provisions for data confidentiality, appropriate security measures, compliance with applicable data protection laws (including DPDP Act 2023 and RBI guidelines), data breach notification requirements, and data retention/deletion obligations. When customer interact directly with third-party services, their own privacy policies and terms apply. NABFINS is not responsible for the data practices of external websites or services beyond our contractual relationships.

DATA RETENTION AND STORAGE POLICY

NABFINS retains customers personal information as per the Preservation of Records policy of NABFINS. The Company commits to data localization requirements and secure storage practices throughout the retention period. Upon expiry of the retention period, or when customers exercise their right to data deletion or forgetting, the Company will purge the respective data from its systems, subject to any overriding legal or regulatory obligations.

DATA SECURITY MEASURES AND BREACH NOTIFICATION

The Company implements comprehensive security measures including end-to-end encryption for data transmission and storage, multi-factor authentication for system access, advanced firewalls with intrusion detection systems, role-based access controls, automated backup with disaster recovery capabilities, regular security updates and patch management, and continuous monitoring systems. Organizational measures include robust information security policies, regular employee security training, background verification for data-handling personnel, periodic access reviews, and third-party security assessments. Physical security is maintained through secure data centers with 24/7 monitoring, biometric access controls, surveillance systems, and environmental controls. In case of a data breach, NABFINS will contain and assess the breach within 24 hours of discovery, conduct thorough investigation to determine scope and impact, notify the Data Protection Board of India within 72 hours of becoming aware of the breach, and inform affected individuals promptly if the breach poses high risk to their rights and freedoms. Breach notifications to customers will include the nature of data involved, likely consequences, remedial measures taken, contact details for assistance, and recommended protective actions. The Company maintains comprehensive records of all data breaches, including facts relating to the breach, its effects, and remedial actions taken, as required under DPDP Act 2023. The Company ensures continuous compliance through real-time security monitoring and threat detection, regular vulnerability assessments and penetration testing, internal and external compliance audits, security incident logging and analysis, and ongoing performance monitoring of all security controls to maintain the highest standards of data protection.

RIGHTS OF DATA PRINCIPALS

Under the Digital Personal Data Protection Act, 2023, customer have the following rights regarding customer personal data:

Right to Information and Access

Customer have the right to obtain information about personal data being processed, processing purposes, categories of data involved, identity of data fiduciaries and processors, retention duration, and details about data sharing with third parties.

Right to Correction and Erasure

Customers can correct inaccurate or incomplete personal data, update their information, and request deletion when data is no longer necessary, consent is withdrawn, or processing is unlawful. This right may be limited where retention is required for legal compliance or legitimate business purposes.

Right to Data Portability and Nomination

Where technically feasible, NABFINS will provide customer data in machine-readable format or facilitate direct transfer to another service provider. Customer may nominate another person to exercise customer data rights in case of death, incapacity, or legal inability to act.

Right to Grievance Redressal

Customer can lodge complaints about data processing practices through our internal grievance mechanism or escalate unresolved grievances to the Data Protection Board of India.

How to Exercise Customer Rights

Submit written requests through our official channels with adequate identification and specific details of customer's request. NABFINS will respond within the prescribed timeframe under DPDP Act. These rights may be restricted where exercise would adversely affect others' rights, legal compliance is required, or processing is necessary for legal claims or public health reasons.

COOKIE USAGE AND MANAGEMENT

- The Company deploys cookies and similar technologies on our website and mobile applications to enhance user experience through personalization, remember customer preferences and login information for seamless access, analyse website traffic patterns and user behaviour for service optimization, provide targeted content and relevant recommendations based on user interactions, and ensure robust security measures while preventing fraudulent activities.
- Customers retain full control over cookie preferences and can manage them through various mechanisms including browser settings to block or delete cookies, opt-out mechanisms specifically provided on our website, privacy settings available within our mobile application, and third-party opt-out tools where applicable for enhanced privacy control.
- The Company respects customer privacy choices while ensuring transparency in cookie usage across all digital touchpoints. However, customers should note that disabling or blocking cookies may impact the functionality and user experience of our digital services, potentially limiting access to certain features and personalized services.

PROTECTING PERSONAL DATA OF AADHAAR NUMBER HOLDERS

- If Aadhaar numbers are stored in NABFINS's internal systems for any purpose— such as e-KYC, deduplication, or unique identification—NABFINS will strictly adhere to UIDAI guidelines, including secure storage within an Aadhaar Data Vault.

DATA QUALITY

The Company notifies all individuals and customers that it is their primary responsibility to provide accurate, complete, and relevant information to maintain the quality and integrity of data maintained within Company systems. Customers are expected to ensure that all personal information shared during service interactions remains current and factually correct to facilitate optimal service delivery and regulatory compliance. The Company provides designated personnel and contact mechanisms through which customers may request amendments or deletion of their personal information as necessary to maintain data accuracy. Customers are encouraged to proactively review and update their information periodically and promptly notify the Company of any changes to ensure continued service excellence. This collaborative approach between the Company and customers ensures data integrity while supporting effective service provisioning and regulatory adherence.

LIMITATION OF LIABILITY

Scope of Liability:

To the fullest extent permitted by applicable law, NABFINS Limited disclaims all liability for damages arising from:

- Use of our digital platforms, websites, or mobile applications

- Any unauthorized access to or alteration of personal information
- Any technical malfunction, interruption, or unavailability of our digital services
- Any loss or damage resulting from data transmission over the internet
- Any action or inaction by third-party service providers

Specific Disclaimers:

Under no circumstances shall NABFINS Limited be liable for:

- Any direct, indirect, special, incidental, punitive, exemplary, or consequential damages
- Loss of profits, business interruption, or loss of business information
- Damages arising from delays, interruptions, errors, or omissions in transmission or delivery of information
- Any liability for content posted by users or third parties on our platforms
- Damages resulting from viruses, malware, or other harmful components

Regulatory Exception

This limitation of liability shall not apply to:

- Obligations imposed by the Reserve Bank of India or other regulatory authorities
- Statutory rights that cannot be waived under Indian law
- Cases of proven gross negligence or willful misconduct by NABFINS Limited
- Data protection violations resulting from our failure to implement adequate security measures

OPERATIONAL GUIDELINES

The Operational Guidelines of the Privacy Policy of NABFINS will be review and approved by MD & CEO as per the recommendations of the IRMC.

Grievance Mechanism

For any privacy-related concerns, complaints, or queries, customer may submit grievance on the website of NABFINS (<https://www.nabfins.org/grievance>).

Complaint Resolution Process

- Registration: Submit complaint through email, phone or written communication
- Acknowledgment: We will acknowledge receipt within 2 working days
- Investigation: Thorough investigation within 21 days of receipt
- Resolution: Appropriate action and communication of resolution
- Follow-up: Ensure satisfactory resolution and preventive measures

External Forums

If not satisfied with our resolution, customer may escalate to:

- Complaint Management System (CMS) portal under the Reserve Bank Integrated Ombudsman Scheme
- Data Protection Authorities as established under applicable laws

COMMUNICATION AND MARKETING

Email, SMS and WhatsApp:

Communications By providing mobile number / Email and consenting to receive communications, customer agree to receive:

- Transactional messages related to loan account, payments and service updates
- Promotional messages about our financial products and services
- Important notifications regarding regulatory changes and policy updates
- Customer service and support communications

Communication Frequency and Charges Frequency:

Message frequency may vary based on account activity and the specific programs subscribed to by customers. Charges: Standard SMS and data rates may apply as per customer’s telecom service provider

Opt-Out Mechanisms

Customer may opt out of receiving promotional communications from us at any time. To do so, customers to share their preferences by contacting us using the contact details provided on our website.

Third-Party Marketing

NABFINS does not sell, rent, or share contact information with third parties for their marketing purposes. Any promotional communications will only be sent by NABFINS or our authorized service providers. We may share non-personal, aggregated data for industry research and regulatory reporting.

CHANGES TO PRIVACY POLICY

The Company reserves the right to modify, update, or change this Privacy Policy at any time without prior notice to accommodate evolving business requirements, regulatory changes, or operational enhancements. The policy will be reviewed on Annual basis. All policy modifications and updates shall become effective immediately upon posting on www.nabfins.org and will be deemed automatically disclosed to all users and customers. Customers are encouraged to periodically review the Privacy Policy to stay informed about any changes that may affect their data handling and privacy rights. Continued use of Company services following policy updates constitutes acceptance of the revised Privacy Policy terms and conditions.

CONTACT INFORMATION

For any questions, concerns, or requests related to this Privacy Policy, please reach out to us using the contact information provided on our website.
