

**UTKARSH SMALL FINANCE BANK**

**DATA PRIVACY POLICY**

**JANUARY 2017**

**Privacy Commitment:**

Utkarsh Small Finance Bank Limited (The Bank) recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with the Bank. It is the policy of the Bank to keep the personal information of customers secure and use the same solely for the activities related to the Bank. The Bank has adopted the privacy policy aimed at protecting the personal information provided by / disclosed by the customers **(the Policy)**. This Policy governs the way in which the Bank collects, uses, discloses, stores, secures and disposes of personal information and sensitive personal data or information.

**Definitions:**

“Personal information” (PI) 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 the Bank, is capable of identifying such person.

“Sensitive personal data or information” (SPDI) 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 & 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 public domain or furnished under any law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this policy.

**Applicability of the Policy:**

This Policy is applicable to the personal information and sensitive personal data or information collected by the Bank or its affiliates directly from the customer or through the Bank’s online portals, mobile apps and electronic communications as also any information collected by the Bank’s server from the customer’s browser.

**Purpose of Collection and Use of Personal Information / Sensitive Personal Data or Information:**

The Bank collects the PI and SPDI from its customers and uses the same for specific business purposes or for other related purposes designated by the Bank or for a lawful purpose to comply with the applicable laws and regulations. The Bank shall not divulge any personal information collected from the customer, for cross selling or any other purposes, without the written consent of

the customer.

The authenticity of the personal information provided by the customer shall not be the responsibility of the Bank.

The Bank shall not be responsible for any information that is freely available or accessible in public domain or furnished as per law for the time being in force.

### **Disclosure of Personal Information**

The personal information collected by the Bank shall not be disclosed to any other organization except:

1. where the disclosure has been agreed in a written contract or otherwise between the Bank and the customer;
2. where the Bank is required to disclose the personal information to an affiliate / third party / service provider on a need-to-know basis, for providing services / related activities, provided that in such case the Bank shall inform such affiliate / third party / service provider of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of the Bank.
3. To statutory and regulatory authorities on their specific request as per rules in force.

### **Reasonable Security Practices and Procedures**

The security of personal information is a priority and is protected by maintaining physical, electronic and procedural safeguards that meet applicable laws. The Bank shall take reasonable steps and measures to protect the security of the customer's personal information from misuse and loss, unauthorized access, modification or disclosure. The Bank maintains its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. The Bank ensures that its employees and affiliates respect the confidentiality of any personal information held by the Bank.

### **Notice of change**

The Bank may, from time to time, change this Policy.

### **Cookie policy**

The Bank's digital platforms may use various third party analytical tools. These tools may use cookies which are downloaded to the customer's device when the customer visits a website in order to provide a personalized browsing experience. Cookies are used for other purposes like remembering the customer's preferences & settings, provide personalized browsing experience and analyze site operations. These cookies collect information about how users use a website. All information collected by third party cookies is aggregated and anonymous. By using the Bank's website, the user agrees that these types of cookies can be placed on his/her device. User is free to disable/delete these cookies by changing his/her device / browser settings. The Bank is not responsible for cookies placed in the device of user/s by any other website and information collected thereto.