

# Privacy and Personal **Data Protection** **Policy**

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## Distribution

NAME	TITLE
MML ISSG	Information Security Steering Group

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# 1. Introduction

Muthoot Microfin Limited (“MML”) is committed to protect the privacy of personal information shared by employees or customers. This Privacy Policy lays down the collection, usage, protection and sharing of Personal Data/Information or Sensitive Personal Data, in accordance with provisions of the applicable laws including the Information Technology Act, 2000, the Digital Personal Data Protection Act, 2023 and respective rules made thereunder and in particular the Information Technology (Reasonable Security practices and procedures and sensitive personal data or information) Rules, 2011. This Privacy Policy shall be amended from time to time to comply with MML’s business requirements and applicable laws.

This policy applies to all employees, contractors, vendors, customers, and business partners of MML who may receive or have received personal information from MML, who may access or have access to personal information collected or processed by MML, or who may provide or provide information to MML, regardless of geographic location.

This policy provides the information to successfully meet the MML’s commitment towards data privacy.

Any third party working with or for MML, and who has or may have access to personal information, will be expected to have read, understand, and comply with this policy. No Third Party may access personal information held by the organization without having first entered into a confidentiality agreement.

This privacy policy for MML describes how and why MML might collect, store, use, and/or share (“process”) information when individuals use MML’s services (“Services”), such as:

- While visiting the website at <https://muthootmicrofin.com>, or any website that links to this privacy policy.
- Download and use the MML application(s) – Mahila Mitra App, or any other application of ours that links to this privacy policy.
- Engage in other related ways – including any sales, marketing, or events.

## 2. Privacy and personal data protection policy

### 2.1 Collection of personal information

MML collects and uses personal information for business purposes or for a lawful purpose to comply with applicable laws and regulations. These information's are collected from persons when they start an account, express an interest in obtaining information about MML or its products/services, when they participate in activities on the services, or otherwise when they contact MML. For personal data collected under this Privacy Policy, the controller will be MML and the MML affiliates which has been employed.

MML and its authorized third parties will collect information pertaining to individuals' identity, demographics, and related evidentiary documentation. For the purposes of this document, a 'Third Party' is a Service Provider who associates with MML and is involved in handling, managing, storing, processing, protecting, and transmitting information of MML. This term also includes all Sub-Contractors, Consultants and/or representatives of the Third party.

MML may also collect your personal information when anyone uses our services or websites or otherwise interacts with MML during the course of the MML relationship.

MML may keep a log of the activities performed on its network and websites by using various internet techniques such as web cookies, web beacons, server log files, etc. for analytical purposes and for analysis of the amiability of various features on MML site. This information may be used to provide with a better experience at MML portal along with evidentiary purposes. At any time while surfing MML site, if any one does not wish to share surfing information, may opt out of receiving the cookies from MML site by making appropriate changes to the browser privacy settings.

If anyone choose not to provide respective information or consent for usage of personal information or later on withdraw the consent for usage of the personal information so collected, MML reserves the right to not provide the services or to withdraw the services for which the said information was sought.

The personal information that MML collect depends on the context of every individual interaction with MML and the services, the choices individuals make, and the products and features being used. The personal information MML collects may include the following:

- Full Name
- Residential/ office address (Permanent/ Communication)
- Phone Number
- Age/Date of Birth/Date of Incorporation
- Gender
- IP Address/Web Cookie

- Financial statements (applicable to vendors only)
- Employment history (applicable to employees only)
- Employee education history (applicable to employees only)

**Sensitive Information:** When necessary, with the consent of individuals or as otherwise permitted by applicable law, MML processes the following categories of sensitive information:

- Information contained in the documents used as proof of identity and proof of address.
- GST Number (applicable to vendors only)
- Bank account number.
- Individual's bank statements (applicable to customers only)
- Credit rating information (applicable to customers only)
- Employee performance data

Provided that, any information that is freely available or accessible in 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 purpose of these rules.

**Application Data:** MML application(s) may also collect the following information if chosen to provide with access or permission:

- Geo-location Information.
- Mobile Device Data.
- Push Notifications.

All personal information that individuals provide to MML shall be true, complete, and accurate, and the individuals must notify MML of any changes to such personal information.

**Automatically Collected Information:** MML also automatically collect certain information when someone visit, use, or navigate its services. This information does not reveal specific identity (like person name or contact information) but may include device and usage information, such as IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when interested parties use MML's services, and other technical information. The information MML collects may include:

- Log and Usage Data
- User data
- Device Data
- IP Address data
- Web Cookie information

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

## 2.2 Period of storage of information

MML shall only keep the personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal or regulatory requirements). No purpose in this policy will require keeping the individual's personal information for longer than required.

When MML have no ongoing legitimate business need to process the stored personal information, MML shall either delete or anonymize such information, or, if this is not possible (for example, because the personal information has been stored in backup archives), then MML will securely store the personal information and isolate it from any further processing until deletion is possible.

## 2.3 Usage of Information

Any of the information MML collect may be used in one of the following ways:

- Facilitate account creation and authentication and otherwise manage user accounts.
- Check and process your applications which may be submitted for availing any financial services.
- Personalize experience – information helps respond to individual needs in a better way.
- Verify the individual's identity as per applicable laws.
- Improve experience with MML's products/ services.
- Improve customer service.
- Process transactions easily.
- Respond to user inquiries/offer support to users and to address grievances if any.
- Administer a contest, promotion, survey, or other feature – Individual may opt out.
- Send periodic emails – The email address may be used to send information, respond to inquiries, and/or other requests or questions.
- Keep customers informed about MML's new products or services unless customers unsubscribe to these emails.
- Carry out research and analysis to study customer use and experience on an anonymous or personalized basis.
- Protect MML's services.
- Save or protect an individual's vital interest.
- Other usages that the customer or employee may consent to

Information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without user consent, other than for the express purpose of delivering the service

requested. MML may, however, share personal information to MML's group companies, for providing better, if users expressly consent to do so.

## 2.4 Protection of Information

MML implements a variety of security measures to protect personal information from unauthorized access or disclosure. MML's security practices and procedures limit access to personal information on need-only basis. MML employees who have limited access to customers personal information are bound by Non-Disclosure and Confidentiality Policies.

MML take adequate steps to ensure that its third parties adopt reasonable level of security practices and procedures to ensure security of personal information. MML may retain the personal information only for as long as required to rendering of services or if otherwise required under any law. When MML dispose off the personal information, it will use reasonable procedures to erase it or render it unreadable (for example, shredding documents and wiping electronic media).

MML has implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information that MML processes. However, despite these safeguards and efforts to secure the information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, hence, MML cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat MML's security and improperly collect, access, steal, or modify the information. Although MML shall do its best to protect the collected personal information, transmission of personal information to and from MML's services is at the individual's own risk. The customer shall only access the services from within a secure environment.

## 2.5 Disclosure and Transfer of Information

MML do not sell, trade, or otherwise transfer to outside parties the personally identifiable information collected. This does not include trusted third parties who assist in operations, conducting the business, or servicing customers/employees, so long as those parties comply with applicable laws and agree to keep this information confidential.

**Internal Use:** MML and its employees may utilize some or all available personal information for internal assessments, measures, operations, and related activities.

**Authorized Third Parties:** MML may at its discretion employ, contract, or include third parties (as defined in section 2.1: Collection of personal information) external to itself for strategic, tactical, and operational purposes. Such agencies though external to MML, will always be entities which are covered by contractual agreements. These agreements in turn include MML's guidelines to the management, treatment, and secrecy of personal information. MML may transfer the personal information or other information collected, stored, processed by us to any other entity or organization located in India only in case it is necessary for providing its services or if consented (at the time of collection of information) to the same. This may also include



sharing of aggregated information with them in order for them to understand MML's environment and consequently, provide better services. While sharing personal information with third parties, adequate measures shall be taken by MML to ensure that reasonable security practices are followed at the third party.

MML may obtain consent for sharing your personal information in several ways, such as in writing, online, through "click-through" agreements; orally, including through interactive voice response; or when consent is part of the terms and conditions pursuant to which MML provide the service. MML, however assure that MML does not disclose your personal information to unaffiliated third parties (parties outside MML corporate network and its Strategic and Business Partners) which could lead to invasion of privacy.

Further, non-personally identifiable information may be provided to parties for marketing, advertising, or other uses.

Government Agencies: MML may have to disclose personal information or sensitive data with Government agencies or other law enforcement agencies, mandated under law and if called upon to do so, for the purpose of verification of identity or for prevention, detection, investigation or otherwise including but not limited to cyber incidents, prosecution, and punishment of offences.

The information provided by you may be disclosed to:

1. RBI/SEBI/ NSE/ BSE/ / Registrar and transfer Agents / Collecting Banks / KYC Registration Agencies (KRAs) and other such agencies, solely for the purpose of processing your transaction requests for serving you better,
2. Any judicial or regulatory body,
3. Auditors

## 2.6 Withdrawal of consent

As MML relies on the consent of individuals to process the personal information, which may be express and/or implied consent depending on the applicable law, the individuals shall also have the right to withdraw their consent at any time. They can withdraw their consent at any time by writing to us at [info@muthootmicrofin.com](mailto:info@muthootmicrofin.com):

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows, will it affect the processing of the personal information conducted in reliance on lawful processing grounds other than consent.

If the individual would at any time like to review or change the information in their account or terminate their account, they can:

- Contact MML using the contact information provided.

Upon the request to terminate the individual's account, MML shall deactivate, anonymize, or delete the account and information from the active databases. However, MML shall retain some information in the backup files to prevent fraud, troubleshoot problems, assist with any investigations, enforce MML's legal terms and/or comply with applicable legal requirements.

### 3. Concerns and feedback

MML is committed to safeguard personal information collected and handled by it. In case of any concern or feedback regarding protection of personal information, respective parties can contact at [info@muthootmicrofin.com](mailto:info@muthootmicrofin.com). Alternatively, privacy-related concerns or feedback can be forwarded to [info@muthootmicrofin.com](mailto:info@muthootmicrofin.com).

### 4. Applicability of the policy

This Policy applies to all Personal Data collected, received, possessed, owned, controlled, stored, dealt with, or handled by MML in respect of a relevant individual/vendor/ service provider.

Personal Data and Information that MML handles as part of its operations relevant to its vendors in the context of availing outsourced services shall be processed according to the contractual provisions, and specific privacy practices agreed upon with each vendor.

Personal Data and information that MML handles of its employees shall be in accordance with the agreement with the relevant employee. The policy shall also apply to employees during and after the period of employment at MML.

### 5. Review

The Privacy and Personal Data Protection policy are considered as under and will be reviewed and updated over a period of time as part of continual improvement.

