Muthoot Microfin Limited – Client Data Privacy and Security Policy

Purpose

The policy ensures to maintain the confidentiality, security, and accuracy of clients' personal, transactional, and financial information. It covers gathering, processing, use, distribution, and storage of client information.

Policy Statement

As a part of our "Client Protection Principle" we are committed to maintain privacy of client data.

Client documents/information is kept with security at every stage of loan processing, disbursement and during the tenure of the loan. Due accountability has been fixed with every employee who are responsible for collection of data, entry of data in software, and those having access to client data.

Staff has to ensure that they have to collect all the documents from client before the 3rd day of CGT. As per MFIN's directives, following are the documents required to initiate a loan request.

1) 2 photographs of the loan applicant and co-applicant, together (each to be affixed in Loan application and Loan card)
2) At least 2 KYC IDs are taken for the client from amongst 4 KYC IDs (Aadhaar, Voter, Ration, MNREGA job card)
3) First (or Primary) KYC ID: Aadhaar card
4) Secondary KYC documents: Any id proof from the below mentioned:
    - Voter/Election Card
    - Driving License
    - PAN Card
    - Passport
    - Ration Card
    - MNREGA Job Card
    - Passbook of Nationalised Bank with photograph
    - For Tamil Nadu, Ration card is mandatory as secondary ID.

Under no circumstances the relationship officer is authorized to collect additional proof of identity from the client. During the CGT process it is his/her responsibility to educate client on rationale behind collecting the required documents.

Pre and Post Disbursement Process

Documents and data entry: It is the responsibility of Relationship officer (RO) to safely collect and keep the centre file of all the clients in the centre till the 3rd day of CGT process. On

completion of CGT (s)he hands over the documents to Credit Officer (CO). The CO is responsible for the safe custody of all the client file (that consists of loan application form, loan agreement, KYC documents of clients, bank account details CPV form) during the GRT process and thereafter. To correctly enter all the documents in software is also a part of his key responsibilities. There are in-built checks in the software to verify that the information is correctly entered. Still safe (almirah) is provided at every branch office for maintaining the files and registers, with CO being the primary custodian of the key and Branch manager keeps the other set of the key. Only authorized person with prior permission have access to client documents.

After necessary data entry and checks from Credit Bureau, CO confirms about client's loan approval status to the RO. In case the loan is rejected, documents are returned to the client at the earliest possible meeting. CO is also responsible to maintain scroll sheets at branches in month-wise folders.

Employees use of files outside the office is controlled (e.g. they cannot take client files or loan documents to their homes or access the MIS from home). Branches must maintain records of the names of staff who request access to client files.

Authorized persons to access client data: Following persons are authorized to access client data upon approval from Managing Director, CEO, COO, Chief Compliance Officer or Chief Risk Officer.

1) Internal auditors of the company
2) Company appointed external/statutory auditor
3) Representative from Credit bureau
4) Representative from Regulator (RBI)
5) Management representative of the company
6) Existing Lenders
7) Investors and board of directors of the company
8) Representative from MFIN or Sa-Dhan identified by senior management of the company

Instructions

- **Handling documents of inactive loan accounts:** Documents of loans closed/ in-active loans are kept separately and after expiry of stipulated time are destroyed completely.

- **Insurance:** To ensure the safety of client data, all branch offices are insured (fire insurance and transit insurance)

- **Restricted access to information (Viewing and editing rights):** Based on roles and responsibilities of designated staff and seniority level there is a restricted access to client's personal, financial and transactional information. (Eg: If CO has entered incorrect information of any client and he wants to change/ edit client related data then he has to seek approval from IT team)

- **Client's consent on data sharing:** Starting at the time of the application, clients give their consent to share personal information with the external audience like credit bureaus, guarantors, regulatory body, group companies, insurance agents, and marketing material or other public content used for promotional purposes.

- **Retention of Personal Information:** Personal data processed are not kept for longer than is necessary for the purposes for which it is processed in line with legal, regulatory, or statutory obligations. At the expiry of such periods, the personal data will be deleted or archived to comply with legal retention obligations or in accordance with applicable statutory limitation periods.

- **Training on privacy of client's data:** The Company shall also provide staff training on privacy of client's data and disciplinary action shall be defined in HR manual against employees who misuses client's information.

Amendment of this Policy

The Board of Directors of the Company has the right to amend or modify this Policy.

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