

ASH GROVE CAPITAL PRIVATE LIMITED

(FORMERLY KNOWN AS UNOGROWTH CREDIT INDIA PRIVATE LIMITED)

PRIVACY AND STORAGE POLICY

Version History

Version	Approved by	Date of Approval/Review
1.0	Board of Directors	29 th June 2025

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1. BACKGROUND

Reserve Bank of India vide its directions on Digital Lending, 2025 has instructed all the Non-Banking Finance Companies (NBFCs), involved in digital lending, to adopt the necessary guidelines with respect to privacy and Storage of the customer.

This Privacy and Storage Policy ("**Policy**") describes the practices and policies of Ash Grove Capital Private Limited (formerly known as Unogrowth Credit India Private Limited) ("**AGCPL**" or **Company** or "**we**" or "**our**" or "**us**", as the context may require) in relation to collection, use, processing, storage, retrieving, disclosure or transfer of your information, including personal information and sensitive personal data or information that AGCPL may receive through your access, interaction or use of our website, mobile application or any other medium through which we offer our Services (collectively, the "**Platform**").

The Company is a Non-Banking Financial Company ("**NBFC**") registered with the RBI and having registered office at 90/20, Ground Floor, Malviya Nagar, South Delhi, New Delhi, India, 110017.

Our Privacy and Storage Policy is subject to change from time to time, and we will make all reasonable efforts to inform and update our customers ("**you**" and "**your**") of any changes. It is strongly recommended that you review our Privacy and Storage Policy, as available on the Platform. In case you need any clarification regarding this Policy, please do not hesitate to contact us at compliance@ashgrove.in

By using the Platform and/ or by providing your information, you consent to the collection, use, storage and transfer of the information disclosed by you in accordance with this Privacy and Storage Policy.

2. INFORMATION COLLECTED AND USED BY THE COMPANY.

The information collected by the Company would fall under either of the two categories (a) Data provided by you, and (b) Information we may collect with your explicit consent in order to render our services, including but not limited to the following:

A. Data provided by you:

- (i) Data provided by you on the Platform.
- (ii) Data provided while corresponding with us over e-mail, chat or call.
- (iii) Data and information, you provide when you register to use the Platform to any of our Services, search for a Service, or when you report a problem with our application or our Services.

- (iv) Your name, address, gender, date of birth, e-mail address, phone number, username, password and other registration information.
- (v) Identity Proof and address Proof such as PAN Card, proof of possession of Aadhaar Card, financial information such as employer name, monthly salary, bank account number, bank statements, credit information, copies of identification documents, etc.
- (vi) Data generated by your usage of our website and associated internet applications.
- (vii) The data provided by you *inter alia* enables us to create your profile, complete your KYC requirements, offer you the Services and provide you with customized support.

B. Information we may collect about you:

- (i) **Credit Information:** With your consent, we collect information from credit information companies, which would help the Company with customer verification and due diligence.
- (ii) **Device Information:** We may collect Information related to the electronic device you use to access the Portal, such as your devices' internet protocol (IP) address, browser type, operating system, software, device type, device ID, device international mobile equipment identity (IMEI) and date and time at which you visit the Portal or avail the Services. This helps us learn about and verify your identity as well as detect and prevent fraud.
- (iii) **Data related to Performance of the Application:** In addition to the above, we also track and collect the data related to the performance of the Application and other diagnostic data for identifying and resolving any technical glitches that may be identified from such data and also for improving the overall functionality of the Application.
- (iv) **SMS:** We may need access to the SMS functionality in your device for the purposes of activation of certain Services on your device. We may periodically collect transactional SMSs. This collection is strictly limited to SMS pertaining to your financial transactions (e.g., bank credits/debits, payment alerts) from your registered financial accounts. The sole purpose of this collection is to verify your bank account details and to accurately assess your financial position and repayment capacity, which is essential for processing your loan application and providing our services. We strictly adhere to RBI guidelines and do not access or collect your personal SMS, call logs, contact list, or media files.
- (v) **Location:** We may receive, collect and analyse your location information, which may be accessed through a variety of methods including, *inter alia*, GPS, IP address, and cell tower location and your precise location based on GPS data.
- (vi) **Cookies and similar technologies:** Cookies are small data files that a Website stores on your computer. We will use cookies on our Website similar to other lending websites / apps. Use of this information helps us identify you in order to make our Website more user friendly. Most browsers will permit you to decline cookies, but if you choose to do this, it might affect service on some parts of our

Website.

- (vii) **Third Party Information:** We may also work closely with third- party business partners, technical sub-contractors, analytics providers, search information providers, account aggregators, etc. and may lawfully receive Information about you from such sources. Such Information may be combined with Information collected on the Portal and such other Information as provided in this Policy.
- (viii) **Other Information:** We may seek additional information from you as needed and in accordance with the Applicable Law. You may choose to provide or reject request for such additional information.

C. Use of Customer Data

We may use your data (as mentioned above) for various things, including specific business purposes (“Services”), which will include the following:

- a) to provide services that might be required by you,
- b) to process the customer’s financial and non-financial transaction requests,
- c) to undertake research and analytics for offering or improving the Company’s services,
- d) to check and process the user’s application for availing any financial services,
- e) to share any updates/changes to the Services and the terms and conditions with the user/customer,
- f) to take up and investigate any complaints/claims/disputes.
- g) to respond to queries and feedback submitted by you
- h) for verification of your identity as per the internal policies, including KYC.
- i) to fulfil the requirements of applicable laws / regulations and / or court orders / regulatory directives received by the Company.

3. Retention of information collected.

The Company would retain the data submitted/collected by you for such reasonable period as would be necessary for it to deliver its Services, also taking into account the Company’s need to answer queries or resolve problems, provide improved and new services, and comply with legal requirements under applicable laws.

4. Sharing of Information

Where possible, you shall have the option to restrict disclosure to third parties. However, where sharing of information to a particular third party is necessary for providing the products and/or services, you shall not be able to avail such products and/or services in case you decide to restrict such disclosure. The Following are the third parties to whom

your information may be shared for providing/enabling the products and/or services:

Type of Third Party	Description
Banking partners, payment processing partners, co-branding partners, lending partner, third-party vendors, lending service provider, Digital Lending App and credit information companies	We may share your information/information submitted by you to financial institutions and service providers such as payment processors, card issuers, NBFC partners and banking partners, collection service providers, credit information companies, to facilitate transactions/for providing such product and/or service.
IT Service Providers	We may share your information to IT Service Providers who are engaged in the provision of information technology services for fulfilling various aspects of the Platform and for research and data analytics.
Identity and other information verification providers	We may share your information to identity and other information verification to complete identification and information verification processes in accordance with applicable laws.
Government and regulatory organisations	We may share your information with the Government, law enforcement agencies, authorities, and regulatory bodies when the Company must comply with its legal obligations.
Marketing, business development, and sales partners	We may share your information with marketing, business development and sales partners for the purpose of improving and carrying out marketing or business development activities to provide better services to you through our Platform.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities on the Platform, we may collect and store such information for providing services and for record keeping purposes.

5. Storage of Data

We will retain any data or information provided by you till the time we render our services towards you. Our data retention policy is restricted to the provision of our services towards you. You can request for the deletion of your information from us at any stage. Our data retention, storage and deletion policy is in consonance with the applicable laws and

guidelines of the RBI.

Consent Logs

All customer data, including personal and sensitive personal information, is stored in servers located within India in compliance with RBI's data localisation requirements.

We maintain verifiable and time-stamped digital logs of all consents obtained from users, in compliance with RBI's Digital Lending Guidelines.

6. PROTECTION OF USER INFORMATION

We take steps designed to protect user information that we collect, store, or disclose. These steps include maintaining information security controls, such as encryption technologies when transferring or storing data, firewalls, and controls over the physical access to our systems. We regularly evaluate the security controls that we use, as well as the controls that our service providers use, for protecting the security and confidentiality of user information. Our goal is to maintain effective security controls, as measured by relevant industry standards and by independent security auditors, for all of the ways that you can use our Services.

As part of our security breach response process, we report all types of unusual security incidents, including successful and unfruitful unsuccessful breaches of security incidents, to the RBI within 24 hours.

You shall be entitled to prevent unauthorised usage of your information by our personnel/agents by informing us, within 10 (ten) days of being informed of the proposed use, that you do not wish to disclose such information. You can also exercise the right at any time by contacting us at compliance@ashgrove.in

7. Procedure for correcting information

In the event that any information provided by you is inaccurate, incomplete or outdated, you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data at our end immediately. We urge you to ensure that you always provide us with accurate and correct information/data. In case of modification of personal information, users will be required to furnish supporting documents relating to change in personal information for the purpose of verification by the Company.

8. Right to withdraw/deny consent

You have the option, to deny/withdraw your consent at any time for the collection/continued collection, use or disclosure of your information or request for deletion of your information by mailing us at compliance@ashgrove.in. In case of withdrawal of your consent, we reserve the option not to provide the Services for which such information was sought. In case the services are already availed and then you raise a request to withdraw consent, then we have the right to stop the provision of the Services. We shall have the right to continue processing your information till such credit facility/Service has been repaid in full,

along with any interest and dues payable and/or for such period as may be allowed under applicable law. However, we shall not retain your data and information if it is no longer required by us and there is no legal requirement to retain the same.

9. DATA DESTRUCTION PROTOCOL

We understand the importance of safeguarding our customers' sensitive data. Our Data Storage Policy is designed to ensure that any personal or confidential information entrusted to us is securely and irreversibly destroyed when it is no longer required, in accordance with relevant legal and regulatory standards.

We will only destroy data that is no longer needed, ensuring compliance with applicable data retention policies and customer instructions.

Our policy ensures that all data destruction processes are designed to make data irrecoverable. Whether through physical destruction or software-based erasure, we use certified methods to eliminate the possibility of data recovery.

Data Destruction Process:

1. Identification and Inventory of Data:
2. Verification
3. Documentation
4. Secure Disposal

10. Communication with Company

The name and contact details of the Nodal/Grievance Officer are provided below. You may contact the Nodal/Grievance Officer to address any discrepancies and grievances you may have with respect to your information with the Company and the same will be redressed expeditiously.

Name: Ms. Neeru Grover

Designation: Grievance Redressal Officer

Email : grievance@ashgrove.in

Phone: 9266766886

Address: 90/20, Ground Floor, Malviya Nagar, South Delhi, New Delhi, India, 110017.