

**COMPREHENSIVE PRIVACY POLICY
OF
FINEXO SOLUTIONS PRIVATE LIMITED**

PRIVACY POLICY

I. INTRODUCTION

Finexo Solutions Private Limited (herein referred to as “**Finexo**”, “**We**”, “**our**”, or “**us**”) is engaged in the business of providing advanced data and technology solutions, including lending technology consulting and solutions such as Application Programming Interface (“**APIs**”), Software Development Kit (“**SDKs**”), software tools, code snippets, algorithms, documentation, technical support, and the features and connectivity offered through our proprietary Platform. This Privacy Policy explains how we collect, use, store, disclose, and safeguard Personal Data when Users access or use our website, Platform, mobile application, APIs, SDKs, technical documentation, or any other Services provided by Finexo. By using our Services, You acknowledge and agree to the practices described in this Privacy Policy (“**the Policy**”). We are committed to ensuring privacy and compliance in accordance with the Digital Personal Data Protection Act, 2023 (“**DPDP Act**”), Reserve Bank of India (NBFC - Credit Facilities) Directions, 2025 (“**RBI Guideline**”), and other Applicable Laws.

II. APPLICABILITY OF THE POLICY

This Policy applies to all individuals and entities who interact with our Services, including Users, lenders, merchants, partners, Service Providers that help provide our Services to the Users, and any person whose data is processed in the course of onboarding, KYC verification, due diligence, API integration, technology enablement, loan lifecycle support, fraud checks, and compliance processes. It also applies to visitors to our website and Users engaging with our Platform through any integrated system. By accessing our Services, You consent to the collection and Processing of Your Personal Data as described herein.

III. DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings assigned to them below. These definitions should be read in conjunction with the remaining sections of the Policy and shall apply irrespective of whether the terms appear in singular or plural form.

“**Applicable Laws**” means all laws, regulations, rules, guidelines, circulars, notifications, and directions issued by any governmental, regulatory, or statutory authority in India, including but not limited to the Information Technology Act, 2000; the Information Technology (Reasonable Security Practices and

Procedures and Sensitive Personal Data or Information) Rules, 2011; the DPDP Act, and RBI Guideline.

“Third Parties” means Service Providers, vendors, partners, payment aggregators, credit bureaus, Non-Banking Financial Companies (NBFCs), technical integration partners, cloud Service Providers, analytics providers, or any other external entity engaged by Finexo for the purpose of providing or enhancing the Services offered to Users.

“Device Information” means data collected from the device used to access Finexo’s Platform, including device model, operating system, IP address, unique device identifiers, browser type, and network information.

“Personal Data” means any data about an individual who is identifiable by or in relation to such data, either directly or indirectly, and includes personal information as defined under the DPDP Act and sensitive personal data as prescribed under Applicable Laws.

“Platform” means Finexo’s proprietary digital Platform, including its website, mobile applications, APIs, SDKs, software, code snippets, algorithms, dashboards, interfaces, and all related features, technologies, and functionalities offered by Finexo for lending technology Services and data-driven solutions.

“Processing” means an operation or set of operations performed on Personal Data, including collection, storage, retrieval, recording, organisation, structuring, adaptation, alteration, use, sharing, transmission, disclosure, dissemination, erasure, or destruction.

“Services” means the data and lending technology solutions provided by Finexo, including its APIs, SDKs, software, code snippets, algorithms, documentation, technical support, and all features, functionality, and connectivity offered through Finexo’s proprietary Platform.

“Service Provider(s)” means any Third Party appointed by Finexo to assist in the performance of its functions, including IT infrastructure providers, KYC verification providers, payment Service Providers, data storage partners, and technical or operational support vendors.

“User”, “You”, or “Your” means any individual, merchant, borrower, website visitor, API integrator, developer, or authorised person who accesses, uses, or interacts with Finexo’s Platform or Services in any manner.

IV. PERSONAL DATA WE COLLECT

Finexo collects Personal Data provided voluntarily by Users during onboarding, registration, communication, and usage of our technology solutions. This includes

identity information such as name, date of birth, contact details, gender (if applicable), and government-issued identification documents like PAN, Aadhaar (only through authorised methods), passport, or other KYC documentation. We may also collect address details, financial information required for verification, business details of merchants/partners that help provide our Services to the Users, and information submitted for due diligence purposes. Additionally, when You communicate with us, we may retain records of Your emails, messages, calls, and support requests.

We additionally collect data automatically when Users access our website, APIs, Platform, or mobile Services. This includes Device Information, Internet Protocol (“IP”) address, browser details, operating system, usage logs, integration-related telemetry, access timestamps, and other information necessary for secure and effective delivery of our Services. We may also receive data from Third Parties, including partners, verification agencies, statutory authorities, credit bureaus (with lender authorisation), financial institutions, fraud detection Service Providers, and publicly available databases.

V. PURPOSE OF PROCESSING PERSONAL DATA

Finexo processes Personal Data strictly for lawful, specific, and legitimate purposes. These include enabling the use of our technology solutions; onboarding Users; verifying identity; facilitating KYC processes; providing connectivity and integration between lenders, merchants, and Users; offering contractual and technical support; detecting fraud; conducting risk and security assessments; improving the performance and features of our Platform; and fulfilling regulatory, legal, and audit obligations. Personal Data may also be used for analytics, product development, debugging, and algorithm training, but only in anonymised or aggregated form that does not identify individuals. Finexo does not sell Personal Data to any person or entity.

VI. LEGAL BASIS FOR PROCESSING

We process Personal Data when it is required for fulfilling contractual obligations with Users or partner institutions; where the Processing is based on consent provided by the data principal; to comply with legal and regulatory obligations applicable to Finexo or to partner that help provide our Services to the Users under the digital lending ecosystem; or when Processing is necessary for Finexo’s legitimate interests such as fraud prevention, system security, product improvement, and ensuring the safety and integrity of our technology solutions.

VII. USE OF COOKIES AND TRACKING TECHNOLOGIES

Our website and Platform may use cookies and similar tracking technologies to enhance User experience, secure login sessions, analyse usage patterns, and

support integration activities. Cookies help us deliver personalised content, maintain Platform stability, and monitor technical performance. You may choose to disable cookies in Your browser settings; however, this may affect Your ability to access or use certain features of our Services.

VIII. SHARING AND DISCLOSURE OF PERSONAL DATA

Finexo shares Personal Data only when necessary and strictly in accordance with applicable law. Personal Data may be shared with regulated financial institutions, including partners and lenders, for loan Processing, KYC validation, verification, and compliance with Reserve Bank of India (“RBI”) digital lending requirements. We also engage Service Providers such as KYC verification agencies, cloud Service Providers, fraud detection partners, data analytics processors, and IT support vendors under legally binding obligations to ensure confidentiality and compliance with applicable data protection standards. Personal Data may also be disclosed to statutory, regulatory, or law enforcement authorities when such disclosure is legally required. If Finexo undergoes a merger, acquisition, restructuring, or business transfer, Personal Data may be shared with the acquiring or resulting entity under appropriate safeguards.

For the purpose of improving, operating and effectively providing our services and products offered to you, your personal information may be shared with such third parties who are contractually obligated to process the data in accordance with applicable laws. A current list of these third parties with whom your data may be shared is available in Third Parties List in Annex I. This list is subject to periodic updates as we engage or remove vendors based on business needs and compliance requirements.

IX. DATA RETENTION

Finexo retains Personal Data only for the duration necessary to fulfil the purposes for which it was collected or as required under Applicable Laws, including the DPDP Act, RBI Guidelines, and contractual obligations with our partners that help provide our Services to the Users. Retention periods also take into account legal limitation periods for disputes or regulatory audits. After the retention period expires, Personal Data is either permanently deleted or irreversibly anonymised to ensure that individuals cannot be identified from the remaining data sets.

X. DATA SECURITY PRACTICES

We implement robust organisational, technical, and administrative measures to safeguard Personal Data from unauthorised access, alteration, disclosure, or destruction. These measures include encryption of data at rest and in transit, multi-factor authentication, secure coding and integration practices, role-based access controls, periodic security audits, monitoring and intrusion detection

Добавлено примечание (I1): Inserted to include Third Parties List.

Добавлено примечание (I2): Maybe it could be drafted as annex here to be updated periodically?

Добавлено примечание (IAKP2R2): Yes, that is fine. Please find inserted Annex I, which could be populated when required.

systems, and strict handling protocols for API keys and sensitive data. Although we take all reasonable precautions, no technology system can guarantee absolute security; however, we continue to enhance our safeguards to protect User data to the highest standard.

XI. CROSS-BORDER DATA TRANSFERS

Finexo may, where necessary, transfer Personal Data outside India for purposes such as cloud storage, analytics, or technical Processing. Any such transfer is undertaken in compliance with the DPDP Act and only to jurisdictions that offer adequate levels of data protection. We ensure that cross-border transfers are protected by strict contractual obligations, technical safeguards, and adherence to international security standards.

XII. RIGHTS OF DATA PRINCIPALS

Individuals whose Personal Data is processed by Finexo have rights under the DPDP Act, including the right to seek access to their data, the right to correct or update inaccurate or incomplete data, the right to request deletion of Personal Data where legally permissible, the right to withdraw consent, and the right to nominate another person to exercise these rights in case of death or incapacity. You can exercise Your right to rectification by contacting us via support@kviku.in. Users may also exercise these rights by submitting a request to our **Grievance Officer**, whose details are provided below. We will process such requests in accordance with applicable legal requirements.

Добавлено примечание ([14]): Finexo: Kindly note this. You need to appoint a Grievance Officer to resolve all the grievances of the users.

XIII. CHILDREN'S DATA

Finexo's Services are not designed for or directed toward individuals below 18 years of age. We do not knowingly collect or process Personal Data of minors unless it is permitted under Applicable Laws and undertaken with appropriate consent or authorisation. If we become aware that Personal Data of a minor has been collected without a lawful basis, we will promptly delete such data.

XIV. THIRD-PARTY LINKS

Our website, APIs, or Platform may contain links to Third-Party websites or Services that are not operated by Finexo. We do not control and are not responsible for the content, security, or privacy practices of these Third-Party websites. Users are encouraged to review the privacy policies of such Third-Party Services before accessing or using them.

XV. CHANGES TO THE PRIVACY POLICY

Finexo reserves the right to update or modify this Policy at any time to reflect changes in legal requirements, technological advancements, or internal business

practices. The updated version will be posted on our website along with the revised effective date. Your continued use of our Services after any update constitutes acceptance of the revised terms.

XVI. GRIEVANCE OFFICER AND CONTACT INFORMATION

In accordance with the DPDP Act and RBI Guideline, Finexo has appointed a Grievance Officer to address concerns and queries related to the Processing of Personal Data. Users may contact the Grievance Officer at the details provided below:

Name: [●]

Email: [●]

Добавлено примечание (15): Finexo: Kindly note this.

We will acknowledge User grievances within the timelines prescribed under applicable law and will endeavour to provide a resolution promptly.

XVII. MISCELLANEOUS

The invalidity or unenforceability of any part of this Policy shall not prejudice or affect the validity or enforceability of the remainder of the Policy. This Policy does not apply to any information other than the information collected by us through the Platform. This Policy shall be inapplicable to any unsolicited information You provide us through the Platform or through any other means. All unsolicited information shall be deemed to be non-confidential, and we shall be free to use and/ or disclose such unsolicited information without any limitations. The rights and remedies available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. Rights under this Policy may be waived only in writing. Delay in exercising or non-exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.

XVIII. HOW TO CONTACT US

Please direct any questions or comments about this Policy or our privacy practices to support@kviku.in

XIX. GOVERNING LAWS AND JURISDICTION

This Policy, the Platform, the Services and the use of it is governed by the laws of India and the courts in Delhi shall have exclusive jurisdiction over any disputes connected to our Privacy Policy, Platform or the Services and Your use of it.

XX. YOUR ACCEPTANCE OF THESE TERMS

By using or visiting this Platform, You signify Your agreement to this Policy. If You do not agree to any of these terms, please do not use our Platform or Services.

ANNEX I (See Clause VIII)

List of Third Parties with whom Data may be shared

S. No.	Name of Third Party	Purpose of Sharing Data