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**PRIVACY POLICY  
OF  
QUADRILLION FINANCE PRIVATE LIMITED**

## Privacy Policy

This Privacy Policy ("**Privacy Policy**") describes the practices and policies of Quadrillion Finance Private Limited ("**QFPL**" "**We**" "**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 QFPL may receive through your access, interaction or use of Our website, namely <https://quadrillion.finance/> and the associated android and iOS mobile application, mobile site or any other medium, including the call-centre facility through which We offer Our Services (as defined under the Terms and Conditions) to you through the Portal (as defined under the Terms and Conditions).

In order to facilitate and provide you (and co-applicants, members, nominees, if any) with the Services through the Portal, QFPL and third parties as authorised under the Terms need to collect various data and information from you with your prior and explicit consent.

All terms and conditions regarding usage of the Portal and availing Our Services as set out in the Terms and Conditions are incorporated in this Privacy Policy by reference.

*Capitalised terms not defined in this Privacy Policy will have the meaning as set out in the Terms and Conditions.*

### **User acceptance**

By accessing or using the Portal or by availing Our Services, you agree to the terms of this Privacy Policy. The collection, use, processing, storage, retrieving, disclosure, or transfer of your information, including personal information and sensitive personal data or information (collectively, "**Information**") will be in accordance with this Privacy Policy and as required or permitted under applicable laws, including but not limited to the Information Technology Act, 2000 and the rules framed thereunder, as may be amended from time to time ("**IT Laws**") and the regulations, directions, circulars, guidelines or other mandates issued by the Reserve Bank of India ("**RBI**") and as applicable to the Services (collectively, "**Applicable Laws**").

Any Information, which is the subject matter of this Privacy Policy, provided by you or otherwise collected by Us is collected and retained by Quadrillion Finance Private Limited that has the registered office at No. 9, Ashford Park View, 80 Feet Rd, Industrial Lyt, III Block, Koramangala Ward No 68, Bengaluru, Karnataka - 560034.

Please read this Privacy Policy carefully to make sure you understand how any Information you provide to Us will be handled. If you use any of Our Services, you will be regarded as having read and accepted this Privacy Policy. By accessing or using the Portal, you expressly consent to Our collection, processing, storage, transfer, use, disclosure and handling of your Information in accordance with this Privacy Policy. If you do not agree with the practices described in this Privacy Policy, please do not provide Us with your Information, or use, access or interact with the Portal and/or avail Our Services.

You hereby represent to QFPL that:

1. The Information you provide to QFPL from time to time, is and shall be authentic, correct, current and updated and you have all the rights, permissions and consents as may be required to provide such Information to QFPL.
2. Your providing the Information as well as QFPL's consequent storage, collection, usage, transfer, access or processing of the same shall not be in violation of any agreement, laws, charter documents, judgments, orders and decrees.

If you disclose to Us any Information relating to other people, you represent that you have the authority to do so and to permit Us to use such Information in accordance with this Privacy Policy.

You must ensure that the Information you provide Us remains accurate and up-to-date at all times.

Your Information will primarily be stored in electronic form however certain data can also be stored in physical form. We may enter into agreements with third parties to store or process your Information or data. These third parties may have their own security standards to safeguard your Information or data and We will, on reasonable basis, require such third parties to adopt reasonable security standards to safeguard your Information.

### **Information We collect**

QFPLs uses the Information collected from you or about you to enable you to receive Services on the Portal. You expressly consent for Us to collect the Information in accordance with and for the purposes set-out in this Privacy Policy. If you choose not to provide Us any of your Information, you may not be able to access the Portal or take benefit of some or all of Our Services. QFPL may collect the following Information and you hereby explicitly consent to the following:

1. **Account Information:** When you set up your account on the Portal, We collect your Information, such as your first and last name, referral code used (if any), address details, photo, email addresses, and telephone numbers.
2. **Identity:** For certain Services, We may collect identity and Know Your Customer ("**KYC**") related Information to verify your identity and comply with the customer identification procedures and customer due diligence requirements prescribed under Applicable Laws, such as Permanent Account Number (PAN), photo, Aadhaar related Information (including Aadhaar number, demographic details or Virtual ID) for the purposes of e-KYC authentication with the Unique Identification Authority of India ("**UIDAI**") and One Time Password / Pin (OTP). Please note that e-KYC authentication and submission of Aadhaar information is not mandatory, and you may submit other identity documents in place of Aadhaar information, to verify your identity as stipulated under KYC Directions, 2016 issued by the RBI.
3. **Information to assess credit worthiness:**
  - (a) Students: Education related Information, such as name of college, year of graduation, college ID card, fee receipt;

- (b) Salaried individuals: Employment related Information, such as name of the employer, salary, offer letter, employment ID, and email address issued by the employer;
  - (c) Self-employed: Information related to the self-employment, such as profession, social media links related to your work, work location and monthly income.
4. **Financial Information**: We may collect certain financial Information (such as bank account details or other payment instrument details), rental/lease agreement, gas bill, service or transaction related communications for providing the Services.
  5. **Device**: 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.
  6. **Usage of the Portal**: We may collect Information that you may electronically submit when you post on message boards, or information contained in searches, reviews, ratings or comments that you submit or Information about you from other persons or sources, or the details of your visits of the Portal or usage behaviour on the Portal. Such Information may be used by Us to administer the Portal and compute general statistics regarding the use of the Portal. We may also use this Information to share important or relevant updates and information through email and/or SMS, and also prevent communication that might not interest you.
  7. **SMS**: We may need access to the SMS functionality in your device for the purposes of onboarding you in relation to certain Services on your device. We may periodically collect transactional SMSs for the purpose of provision of Services. You may have restricted access to the Portal or the Services available through the Portal, if you disable, withdraw or do not provide this access.
  8. **Camera and microphone**: We may require access to your device's camera and microphone for a seamless experience, for clicking your selfie, to upload photos, or recording your audio, for verification or onboarding / KYC purposes, or for uploading any other necessary documents on the Portal.
  9. **Location**: We may collect and monitor your location to verify your current address, offer you customized promotions, ensure and check serviceability of Services and to prevent any fraudulent activity. We collect the location data from you in two ways: (i) when you add your pin code on the Portal; or (ii) when you enable such access from your mobile device. We collect this data only when Our Portal is being used. You may have restricted access to the Portal and/or Services available through the Portal, if you disable/withdraw/do not provide this access.
  10. **Installed Apps**: We may periodically collect metadata information of apps installed on your mobile device which includes the application's name, package name, installed time, updated time, version name and version code of each installed application on your device to assess and provide personalized offers to you. You may have restricted access to the Portal or Services available through the Portal, if you disable, withdraw or do not provide this access.

11. **Storage:** We may require permission so that your documents can be securely downloaded and saved on your phone, and so you can upload any required documents as part of using the Services. This helps in providing a smooth and seamless experience while using the Portal.
12. **Feedback Data and Other Data:** We may access and save Information in the following instances:
  - (a) When you contact Us or We contact you, We may record Information provided by you during such communications or record calls for quality and training purposes;
  - (b) When you participate in Our referral programs or use any discount codes offered on the Portal and input such data;
  - (c) When you provide any feedback or comments to Us on the Portal or any other platform.
13. **Third Party Information:** We may also work closely with Affiliates (*defined below*), third party business partners, technical sub-contractors, analytics providers, search information providers, credit information companies, account aggregator 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.
14. **Other Information:** We may also collect your Information via other sources, such as delivery address or contact Information from Our Affiliates and partners, Information from Our payment service providers, public records, publicly available sources or internet sites, vendors, data suppliers and service providers, commercially available marketing lists or registries, telephone directories, social network, news outlets and other related media.

### **Use of your Information**

We may use your Information that We collect in accordance with this Privacy Policy and for the following purposes:

1. To enable you to access the Portal;
2. To avail the Services We offer to you, including any associated services;
3. To facilitate payments for the transactions you make using the Services;
4. To create, maintain or update your account and verify your identity;
5. To conduct due diligence and KYC and/or such other verifications as mandated under Applicable Laws;
6. To validate, process and share your KYC Information, nominee details, and other legally mandated Information with other regulated entities, financial institutions, or service providers (including lending service providers) engaged by Us to facilitate the Services or for verification by such financial institution for enabling/providing services.

7. To facilitate or confirm payments made by you in relation to the Services;
8. To enhance your user experience in relation to the Portal or the Services, including customisation of the Portal or the Services;
9. To conduct credit checks, screenings, assess your credit worthiness, credit scoring and obtain credit information;
10. To conduct audits, market research, project planning, troubleshooting;
11. To identify and/or detect security breaches or attacks, errors, fraud, money laundering, abuse and other criminal activities, and investigating and taking appropriate remedial action;
12. To provide relevant offers or rewards to you, based on your consumption patterns;
13. To enforce Our Terms and Conditions or this Privacy Policy and resolve any disputes;
14. To provide functionality, analyse performance, fix errors, bugs, and improve the usability and effectiveness of the Portal;
15. To deliver any administrative notices, alerts, advice, notifications and communication relevant to your use of the facilities on the Portal, through social media (including WhatsApp), SMS and other media;
16. To recommend products or promotional offers to you that might be of interest to you, identify your preferences. We may also use your preferences or details regarding your usage of the Portal for marketing and other promotional activities;
17. To comply with Applicable Laws or requests received from regulators, government, law enforcement or judicial authorities under Applicable Laws or Our contract with a third party;
18. To disclose to Affiliates, Our and their employees, agents and representatives on a need-to-know basis to facilitate provision of Services;
19. To carry out Our obligations and enforcing rights arising from any contracts between Us;
20. To help improve quality and design of Our Portal, including to create new features, promotions, functionality and services;
21. To help improve the Services; or
22. To fulfil any other purpose for which you provide Us the Information and/or for any other purpose with your consent.

### **Sharing of your information**

You hereby explicitly consent to share your Information for the following purposes: -

1. With financial institutions and Financial Partners (including but not limited to banks and Non-Banking Financial Companies), credit information companies, RBI or other regulatory agencies, to facilitate provision of Services, or as may be required under Applicable Laws;
2. With vendors or service providers (including lending service providers), business partners, co-lending partners/financial partners of QFPL, Affiliates, to provide you with the Services, facilitate account creation, provide technical or customer support, synchronization of your contacts with the Portal or other software applications, send you communications via emails, messages or tele-call to inform you about the Services, or products, offers or services that may be of interest to you, push notifications to your electronic device on Our behalf, and collect, process and settle payments. We may also use other third parties for activities such as conducting surveys for Us, and may share your information with such third parties;
3. With Our holding companies, subsidiaries, affiliates and other body corporates in Our group (collectively, "**Affiliates**"), which operate under common ownership or control, subject to Applicable Laws;
4. With a buyer or other successor in the event of a merger, restructuring, reorganization, dissolution or other sale or transfer of some or all the assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which your Information may be amongst the assets transferred;
5. With law enforcement agencies, courts, regulators and/or other governmental organizations which have jurisdiction, to ensure compliance with orders or government directives;
6. To enforce or apply the Terms and Conditions, this Privacy Policy and other agreements entered with you; or
7. In any other circumstances where We have your consent for any other purpose disclosed by Us when you provide the Information.

### **Third party policies**

We may work with different third parties in connection with the Portal or for providing the Services. Please be aware that any information provided to any third-party or when you click through or are routed to third-party links while using the Portal, Our Privacy Policy no longer will apply and that We are not responsible for the privacy practices of these third parties.

In general, the third-party service providers used by Us will only collect, use and disclose your information to the extent necessary to allow them to perform the services or activities they provide Us. In such cases, We share the Information securely and use commercially reasonable efforts to ensure that all

recipients comply with confidentiality, fidelity and secrecy obligations and sign covenants in this regard. We will require such third party to provide same or equal protection to the Information as provided in this Privacy Policy.

However, certain third-party service providers (such as banks, financial institutions, co-lending partners, payment aggregators or credit information companies), have their own privacy policies in respect to the information We are required to provide to them. For these third-party service providers, we recommend that you read their privacy policies to understand the manner in which your Information will be handled by them. In particular, remember that certain third-party service providers may be located in or have facilities that are located in a different jurisdiction. So, if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which such service provider is or its facilities are located. Once you leave the Portal or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or the Portal's Terms and Conditions and in such circumstances the privacy policy of such other website will apply. We will not be liable for any acts or omissions of the third-party service provider.

### **Our security practices and policies**

1. To secure the Information, we implement reasonable security practices and procedures as mandated under the IT Laws. We have comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures, including protocol for incident management, that are commensurate with respect to the Information being collected and the nature of Our business.
2. While We try Our best to ensure your Information is safe and secure, because of the inherent vulnerabilities of the internet, we cannot warrant complete security of all Information that you share with Us.
3. We protect the security of your Information during transmission by using servers that have Firewall and Secure Sockets Layer (SSL) certificate installed, which encrypts information you input and prevents unauthorized access of such information to or from a private network in addition to maintaining security of your information as per the International Standard IS/ISO/IEC 27001 on "Information Technology Security Techniques Information Security Management System-Requirements".

### **Retention of data, Withdrawal of Consent & Rectification**

You can access and review the Information shared by you, after fulfilling the pending contractual obligations, by getting in touch with Us. You can also withdraw or revoke consent given to Us to process any Information given by you to Us, by writing to Us at [help@quadrillion.finance](mailto:help@quadrillion.finance). Also, you can request deletion of your account on the Portal.

You shall have the right to deny consent for use of specific data on the Portal.

We shall not retain your Information and delete the same if it is no longer required by Us and when there is no legal requirement to retain the same. Do note that multiple legal bases may exist in parallel, and We



may still have to retain certain Information as may be required for audit purpose and/or in accordance with applicable law.

In the event any Information provided by you is inaccurate, incomplete or outdated then you should to provide Us with the accurate, complete and up to date Information and have Us rectify such Information at Our end immediately. We urge you to ensure that you always provide Us with accurate and correct Information to ensure your use of Our Services is uninterrupted.

### **Information of Children**

We do not knowingly solicit or collect Information from children under the age of 18 years. Use of the Portal is only available for persons who can enter into a legally binding contract under Applicable Laws.

### **Modifications**

We reserve the right to change, modify, insert, or delete any provision of this Privacy Policy, from time to time, in Our sole discretion, without any prior notice to you.

We encourage you to periodically review this Privacy Policy for the latest information on Our privacy practices. Your use of the Portal or availing the Services after an updated Privacy Policy becomes effective will indicate your acceptance of the updated Privacy Policy.

### **Cookies**

When you visit the Portal, one or more cookies will be sent to the device being used by you to access the Portal. The cookies are either used to improve the quality of the Portal or for storing your preferences as a user, improving search results and tracking user trends. You have the option of disabling cookies via your browser preferences on your device. However, if you disable cookies on your browser, some parts of the Portal may not function effectively.

### **Contact Us**

If you would like to ask about, make a request relating to, or complain about how We process your information, please contact or email Our grievance officer, at one of the addresses below. Our grievance officer will attempt to expeditiously redress your grievances.

For any request, complain, feedback or grievances, please contact: -

*Grievance Redressal Officer*

Mr. Jayesh M

[www.quadrillion.finance](http://www.quadrillion.finance)

[help@quadrillion.finance](mailto:help@quadrillion.finance)

079-410-57429

Grievance redressal: <https://www.quadrillion.finance/grievance>

