

This Website (**www.a1loans.in**), the mobile application and other related internet based applications (collectively referred to as “website” or “services” or “app”) is owned and operated by Anchorage Finkred Private Limited), (hereinafter referred to as “We”, or “us” or “Our” or “Anchorage”), a Company incorporated under Companies Act, 2013 and having its registered office at unit No. 31/2, Indira Avenue, Flat No.2-A, Indira Nagar First Avenue, Adayar, Chennai, Tamil Nadu - 620 020.

This Privacy Policy gives YOU (“You” or “Your” or “user” or “customer”), the user of the website **www.a1loans.in** and its associated internet based applications details behind the collection of your information and its usage as well as the manner in which we collect, use, store and share information about you. You are advised to read this privacy policy along with and in conjunction with the **Terms of Use** and other information in the website/application.

You are also advised to please take note that any statements made on the Anchorage website/ application shall not be construed as an offer or promise for grant of any financial services.

This Privacy Policy has been prepared in compliance with:

1. Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
2. Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021
3. Guidelines on Digital Lending issued by the Reserve Bank of India (RBI), 2022;
4. Other applicable acts, regulations and rules which require the publishing of a privacy policy for handling of or dealing in personal information including sensitive personal data or information and all applicable laws, regulations, guidelines provided by applicable regulatory authorities including but not limited to the RBI.

## **1. CONSENT**

You hereby expressly consent to provide the information that may be required in relation to the Services (as defined below) being rendered by us. You acknowledge that we shall collect the information detailed under this Privacy

Policy to facilitate lending & non-lending services by partnering with various financial lenders, third parties, service providers, etc based on your requirement to avail such Services (“Services”).

Anchorage will only be using the information for providing the Services to you.

In order to avail any Services being provided by Anchorage by itself or in partnership with other third parties it is important that YOU READ, UNDERSTAND, ACKNOWLEDGE AND UNCONDITIONALLY AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY

IF YOU DO NOT AGREE TO THIS POLICY OR ANY PART THEREOF, PLEASE DO NOT USE/ ACCESS/ DOWNLOAD/ INSTALL THE APPLICATION OR ANY PART THEREOF.

For the users consenting to continue accessing the website and avail the services we offer, this Privacy Policy explains our policies and practices regarding the collection, use, and disclosure of your information.

## **2. INFORMATION COLLECTED AND USED BY ANCHORAGE**

*This section describes the information we may collect about you and how we use that information and is divided into two sections - a) Data provided by you and b) Information we collect with your explicit consent in order to render our services*

### ***Data provided by you***

1. Data provided by you by filling in forms on the Website or associated internet applications.
2. Data provided by corresponding with us (for example, by e-mail or chat or call).
3. Data and information, you provide when you register to use the Website or associated internet applications, subscribe to any of our Services (such as applying for a loan), search for a Service, and when you report a problem with our App, our Services, or any of our Sites.
4. Data including your name, address, gender, date of birth, e-mail address, phone number, username, password and other registration information.
5. Identity Proof, Address Proof, PAN Card, proof of possession of Aadhaar Card (with Aadhaar number duly redacted or blocked out), financial

- information such as employer name, monthly salary, bank account no., bank statements, credit information, copies of identification documents
6. Data generated by your usage of our website and associated internet applications

*This data helps us create your profiles, complete mandatory KYC, decision on loans and provide you with customised support in case of issues as well as ongoing staff training and quality checks.*

***Information we collect about you and how we use that information***

1. With your consent: Information we collect from credit bureaus and customer service providers to help Anchorage with customer verification and diligence required for Anchorage and its partners.
2. Device type: With your permission, we may collect and monitor the type of device (including storage, hardware model, operating system and version, WiFi, mobile network) you use, information pertaining to your device including the list of accounts on your device for the purposes of credit profile enrichment. The information we collect and its usage depends on how you manage your privacy controls on your device.
3. . Device Information: When you install the Application, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the Application and explicitly seek permissions from you to get the required information from the device  
Additionally, we also collect metadata (via the domain server through which the User accesses the App, search queries, IP address, crashes, date & time) for the purpose of improvising the App functionality Further we expressly state that we do not access any phone call logs data.  
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. We collect information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behaviour, thereby

allowing us to improve our products interaction, quality of services and provide a personalised user experience to you

4. **Installed Application Data:** We collect and transmit a list of specific installed applications' metadata information which includes the application name, package name, installed time, updated time, version name and version code of each installed application on your device. This data may be collected even when the app is closed or not in use. We use this information for enriching your credit profile with your explicit consent.
5. **SMS:**With your permission , we may send SMS to verify your registered mobile number and collect and monitor only financial transactional/promotional messages sent by 6 - digit alphanumeric senders for the purpose of credit risk assessment. No other SMS data is accessed.
6. **Camera & Microphone:** With your permission, We may request camera access to a) capture your selfie for the purpose of identity verification and b) scan and capture the required KYC documents in accordance with applicable laws. We may also request microphone permissions to enable a two-way communication between our authorised agents and you for the purpose of performing and completing your Video KYC for the Lending Services. Your audio shall be recorded for regulatory purposes. These accesses are only required for the purpose of on-boarding/ KYC (know your customer) requirements.
7. **Location:** With your permission, 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. In the event of IP detection failure, we will collect the last cached location as your current location. We may collect location information for validating your address and to increase the chances of your loan approval, even when the application is closed or not in use. These accesses are for the purpose of onboarding/ KYC (know your customer) requirements.
8. **Local storage:** Browser web storage, application data caches of our own application in order to improve the performance of the application and render our services to you faster.
9. **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 and online marketplace 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.

10. Record and/or monitor calls: If you call in for a query, Anchorage might for the purposes of quality checks and ongoing staff training record your call. Such recordings may also be used to help Anchorage combat fraud.
11. Third-party advertisements: Anchorage may use third-party advertising companies to serve ads when you visit OUR Website/Application. These companies may use information about your usage preferences (but not your name, address, email address, or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. Anchorage is not responsible for product and services of such websites and is also not responsible for their privacy practices, which Anchorage does not own, manage or control.
12. Retention of information collected: The information collected from you will be retained during the (i) validity of your Account and for the purpose of submission of such information, (ii) As consented by you while creating your User Account (iii) As required by any regulatory norms including but not limited to the norms prescribed under Prevention of Money Laundering Act, 2002, as per Directions/Circulars/Notifications of RBI, and Guidelines for Digital Lending, 2022 prescribed by the RBI , as amended from time to time/any statutory modification thereto, or re-enactment thereof..
13. We ask visitors to our site to use their social media logins (Facebook, Twitter, GMail) to provide customer reviews and feedback on our site.
14. It is expressly stated that we are not accessing mobile phone resources like file and media, contact list, call logs, telephony functions, etc

### **3. PURPOSE OF INFORMATION COLLECTED BY ANCHORAGE:**

Apart from section 2 where we describe the information we collect and how we use the information we collect, we may also use the information we collect for the following purposes:

1. To provide products or services you have requested
2. To provide information to our partners to assist in making credit decisions about you.
3. To help investigate violations of our terms of use or to defend against legal claims.

4. To disclose the information under special circumstances such as compliance with the applicable local law, court summons, court orders, requests/order from legal authorities or law enforcement agencies requiring such disclosure.
5. Search credit bureaus, generate credit reports and fraud prevention agencies.
6. To get in touch with you when necessary and contact you by email, SMS, letter, telephone or in any other way about our products and services.
7. To identify, prevent, detect or tackle fraud, money laundering, terrorism and other crimes
8. To form a view of your credit worthiness, as per Anchorage policies and to identify, develop or improve products that may be of interest to you.
9. Provide information to independent external bodies such as governmental departments and agencies, universities and similar to carry out research.
10. Perform other administrative and operational actions including the testing of systems.
11. Trace your whereabouts for the purpose of on-boarding / KYC (know your customer) requirements
12. Recover any payments you owe to Anchorage or partners.
13. To show you advertisements.
14. Contact you as a survey respondent.
15. To maintain records under applicable law or a may apply to pursuant to agreements executed by Anchorage.
16. Carry out, monitor and analyse our business, Carry out market research, business, and statistical analysis and also direct our efforts for product improvement.
17. Carry out process review and audits under regulatory framework
18. Details required for administration or services and product improvement.
19. Record and/or monitor calls if Anchorage feel necessary for quality checks and staff training. Such recordings may also be used to help Anchorage combat fraud.
20. Location information – for validating your address and to increase the chances of your loan approval. These accesses are for the purpose of on-boarding/ KYC (know your customer) requirements.
21. Information about Apps and Accounts – for credit profile enrichment.
22. to avail identity verification services

23. To generate and maintain User profiles, to provide personalised features, to facilitate collection activities, to maintain regular communications with the User
24. To use/modify/display, distribute and create new material from the information you provide

#### **4. DATA RETENTION AND DELETION**

We at Anchorage, promise to protect your personal data from unauthorised access, misuse, and disclosure using the right security measures based on the type of data and how we are processing the same. We retain information about you to provide a seamless experience, to contact you in case of support required and about your account, to detect, mitigate, prevent, and investigate fraudulent or illegal activities during the course of the Services. We retain your data for as long as necessary based on statutory requirements and to provide you with our services. We may also retain and use your basic personal information inter alia as name, contact number, transactional details and address details as necessary to comply with our legal obligations, resolve disputes, send you notifications about dues or past dues that you owe to Anchorage and enforce our agreements which shall always be in accordance with applicable laws.

#### **5. PROCEDURE FOR DATA DESTRUCTION AND REMOVAL OF USER DETAILS FROM THE RECORD:**

User desirous of having his/her name and other details removed from the records of Anchorage, on receiving the User's request in the Anchorage app, Anchorage shall, subject to the terms mentioned in section 4 and extant acts, rules, regulations, supervisory body/ies guidelines, directions, circulars, notification, as amended from time to time/any statutory modification thereto, or re-enactment thereof, modify, remove and/delete such information. Once the requested action has been taken, Anchorage will inform you via email or call, as per the user's preference. However, you may not be able to use our services after deletion.

#### **6. SPECIFIC CONSENT**

1. You consent and grant us authority to share your information with third parties to
  1. To provide the product or service you have requested;

2. To enable them to contact you or to certain service partners in order to respond to your queries / comments or to resolve service issues and to serve you better and
  3. To collect information about you as mentioned in section 2 of this Privacy Policy and use the same for those purposes mentioned in sections 2 & 3 of this Privacy Policy.
2. By using the Website/Services you authorise us, our affiliates & our associate partners to contact you via email or phone call or sms and offer you their services/ product, imparting product knowledge, offer promotional offers running on their websites & offers offered by the associated third parties. Irrespective of the fact if you have also registered yourself under DND or DNC or NCPR service, you still authorise us to give you a call from Anchorage & its associates/ partners for the above-mentioned purposes.
  3. By providing information, you automatically agree, or promise that the owner of such information has expressly agreed to allow or licence, as the case may be, us to use the information in the manner set out in this Privacy Policy, without the payment of any fees, to the extent permitted by law, also use, licence, reproduce, distribute disclose, and aggregate, non-personally identifiable information that is derived through your use of the App and you hereby provide consent for the same
  4. You can revoke consent already granted to collect personal data at any point in time on your device by using the privacy controls available to you. Please note however that this might impact our ability to render our services to you.

## **7. SHARING OF INFORMATION**

Anchorage shall not will not rent, sell or share User information and will not disclose any of the User's personally identifiable information to third parties (apart from the third parties whose details are mentioned in the links provided herein. [Click here](#) and [here](#) for a full list), except when the disclosure is

1. pursuant to obtaining the User's permission
2. in connection with disclosure to financial institutions and banks
3. in connection with the services being rendered through the App
4. help investigate, prevent or take action regarding unlawful and illegal activities (e) special circumstances such as compliance with court orders.
5. to enforce your contractual obligations to us.

## **8. SECURITY SAFEGUARDS AND ONGOING VIGIL:**

Anchorage intends to protect your information and to maintain its accuracy as confirmed by you. We implement reasonable physical, administrative and technical safeguards to help us protect your information from unauthorised access, use and disclosure. For example, we encrypt all information when we transmit over the internet. We also require that our registered third-party service providers protect such information from unauthorised access, use and disclosure.

Anchorage has stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavour to safeguard and ensure the security of the information provided by you. We use Secure Sockets Layers (SSL) based encryption, for the transmission of the information, which is currently the required level of encryption in India as per applicable law.

We aim to protect from unauthorised access, alteration, disclosure or destruction of information we hold, including:

1. We use encryption to keep your data private while in transit;
2. We offer security feature like an OTP verification to help you protect your account;
3. We regularly review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorised access to our systems;
4. We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
5. Compliance & Cooperation with Regulations and applicable laws;
6. We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

However, we do not warrant that such User information may not be misused in the event our safeguards and protocols are breached by a malicious third-party. Your use of the App is at your sole risk and discretion. You shall be the custodian of your password and comply with the applicable terms mentioned in the Website/Application in this regard., We are not liable to actions of other users with whom you may choose to share your information. The collection, usage, and

sharing of User information are in compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and other applicable laws.

## **9. STANDARDS FOR HANDLING DATA BREACHES:**

While Anchorage invests in best in class Data Safety and Security Standards, in the improbable event of a data breach; Anchorage will activate its Incident Management protocol to mitigate and safeguard our user's data. Furthermore, Anchorage shall inform and update its users as prescribed by the prevalent guidelines at the time.

## **10. PROCEDURE FOR CORRECTING INACCURACIES IN YOUR INFORMATION:**

In the event that any Personal Information provided by You is inaccurate, incomplete or outdated then 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 to ensure Your use of Our Services is uninterrupted. 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 Anchorage.

## **11. CHANGES IN PRIVACY POLICY:**

Our Privacy Policy might change from time to time, and Anchorage will provide notice of it on your email address linked to your Account or can be seen by you in our Website.

## **12. INCORPORATION OF PRIVACY POLICY TO THE TERMS OF USE:**

This Privacy Policy is incorporated to the Terms of use (Terms) and other specific terms of this Website/Services/Account.

## **13. CONTACT**

For any information regarding the Privacy Policy, please contact [info@a1loans.in](mailto:info@a1loans.in)

