



JANASHA FINANCE PRIVATE LIMITED

Registered Office: 1004, 10th Floor, Arunachal Building, Barakhamba Road, Connaught Place, New Delhi - 110001

E-mail id: Info@janashafinance.com; Ph. No. 011 - 43763344

CIN: U67190DL2016PTC306911

Privacy Policy

Janasha Finance Private Limited (“Company”) is a Non-Banking Financial Company (“NBFC”) registered with the Reserve Bank of India (“RBI”) under the Section 45-IA of the Reserve Bank of India Act, 1934, and has its registered office at 1004, 10th Floor, Arunachal Building, Barakhamba Road, Connaught Place, New Delhi - 110001. Company, as an NBFC, is engaged in the business of providing loan/ credit facilities to its Customers itself or through its Lending Partner(s) and the Company owns, manages and operates its website available at [Loankuber | Easy Mortgage Loans](#).

This Privacy Policy (“Policy”) details the guidelines and procedures adopted by the Company in relation to the collection, storage, use, processing, and disclosure of data/ information that its Customers, including You, have chosen to share upon visiting, downloading and using the Company’s App/ mobile application or its website or Digital Platform. **Please read this Policy carefully to understand the Company’s policies and practices regarding Your information and how it will be treated in accordance with this Policy.**

The services offered to You through the Company, or its Digital Platform are referred to as “Services”. Please note that capitalised terms shall have the same meaning ascribed to them under definitions in Paragraph 1 of this Policy. By visiting and accessing the Digital Platform and/ or downloading the App or by using all or any part of the Services, You are expressly agreeing to and consenting to the terms of this Policy and, by any use of the Digital Platform, You shall be deemed to have given Your consent for the processing of Your Personal Data as set out in this Policy agree to the terms of this Policy.

1. DEFINITIONS OF VARIOUS TERMS USED IN THE PRIVACY POLICY

1.1 ‘Company’ shall mean Janasha Finance Private Limited and its group companies.

1.2 ‘We’ or “Us” or “Our” shall mean Company, its Lending Partners and their LSPs and DLAs.

1.3 ‘Customer’ or ‘You’ or ‘Your’ shall mean the prospective and current customers of the Company (including representatives of the customers) and visitors to the Company’s Digital Platform whether the Website or the App.

1.4 ‘RBI’ shall mean the Reserve Bank of India.

1.5 ‘Digital Lending App’ or ‘DLA’ or ‘App’ shall mean the mobile and web-based applications with user interface that facilitate digital lending services. DLAs will include apps of the Regulated Entities (REs) as well as those operated by LSPs engaged by the Company for extending any credit facilitation services in conformity with extant outsourcing guidelines issued by the RBI.

1.6 ‘Collected Information’ shall mean a part or whole of Sensitive Personal Information, Personal Information, and other information pertaining to You received/ collected by us as per this Policy.

1.7 ‘Cookies’ shall mean bits of digital/ electronic information that can transfer to Your hard drive, mobile device, or other device to keep records of Your use or visit to the Digital Platform.

1.8 ‘Device’ or ‘Your Device’ shall mean Your computer or laptop or mobile phone, computer system, computer network, data, computer database or software.

1.9 ‘Device Information’ shall mean unique device identifier such as IMEI number, contact lists (wherever voluntarily provided by You), technical data about Your Device including details regarding associated applications and their usage details.

1.10 ‘Digital Platform’ shall mean the Digital Platforms owned/ used by Janasha Finance Private Limited, including the Company’s website available at [Loankuber | Easy Mortgage Loans](#) and any other **related online services and digital/ electronic media.**



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1.11 ‘Lending Partner(s)’ shall mean those regulated entities registered with the RBI which have partnered with the Company to offer loan/ credit facilities to a Customer through the Company by way of a co-lending arrangement or otherwise.

1.12 ‘Lending Service Provider’ (“LSP”) shall mean an agent of the Company which carries out one or more of lender’s functions or part thereof in customer acquisition or underwriting support or pricing support, servicing/ monitoring of loan accounts, recovery of specific loan or loan portfolio on behalf of the Company in conformity with extant outsourcing guidelines issued by the RBI.

1.13 ‘Location Information’ shall mean information that may be collected by the Digital Platform that identifies Your physical location. This information may be collected from Your Device’s location-aware features when You request certain services that are dependent on Your physical location.

1.14 ‘Personal Information’ or ‘Personal Data’ shall mean any data/ information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with the Company, assists in identifying such person. It also refers to information/ data that identifies You (whether directly or indirectly), such as information You may provide in forms, surveys, online applications or similar online fields available on the Digital Platform. The **‘Personal Information’ or ‘Personal Data’** for the purpose of this Policy shall include the following:

- (a) Your full name/ previous names.
Your full name/ previous names.
- (b) Your postal address,
- (c) Your email address
- (d) Your mobile/ telephone number
- (e) Your domicile.
- (f) Your nationality.
- (g) Your date of birth.
- (h) Details of Your family.
- (i) Details of Your educational qualification, Your college/ university etc.
- (j) Details of Your profession, employment etc.

1.15 ‘Sensitive Personal Information’ of a person shall mean **‘Sensitive Personal Data or Information’** as defined in the ‘Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011’ (**“SPDI Rules”**) and such **‘Sensitive Personal Information’** for the purpose of this Policy shall consist of the following information relating to You:

- (a) Password.
- (b) Financial information such as Bank account or credit card or debit card or other payment instrument details or loan & its repayment details.
- (c) Physical, physiological and mental health condition
- (d) Sexual orientation.
- (e) Medical records and history.
- (f) Biometric information.



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(g) Any such information relating to the above clauses received/ collected by the Company for providing the Services; and

(h) Any of the information received/ collected under above clauses by the Company for processing, stored or processed under lawful contract or otherwise.

However, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

1.16 ‘Services’ shall mean the services offered by the Company or by the Company’s Lending Partner(s) to You on or through the Digital Platform, whether the Website or the App.

1.17 ‘Website’ shall mean the Company’s website available at [Loankuber | Easy Mortgage Loans](#)

2. INFORMATION COLLECTION

2.1 Collection of Personal Information and Sensitive Personal Information- When You use the Digital Platform i.e Website, We may collect and store Your Personal Information and Sensitive Personal Information, from time to time, with Your explicit consent. Our primary goal in doing so is to provide You with a safe, efficient, smooth, and customized experience and services. This allows us to provide services and features that meet Your needs and customize the Digital Platform to make Your experience safer and easier and improve the services provided by us.

In general, You can browse the Website without telling us who You are or revealing some of the Personal Information about Yourself. However, to create an account on the Website or start a business relationship, You must provide us with the certain basic information required to provide customized services. **The information We/ Digital Platform collect from You, inter alia, may include the following data/information:**

(i) Your Personal Information.

(ii) Your Sensitive Personal Information.

(iii) Your Permanent Account Number (“PAN”) details, Aadhaar Number (subject to the statutory requirements relating to Aadhaar Number and its masking), copy or details of Identity Proof & Address Proof and photograph(s).

(iv) Income, financial data and transaction data pertaining to You collected, with Your consent, from Your bankers, Your lenders, Your employer and the entities/organisations.

(v) Credit Information pertaining to You provided by You or received from Credit

Wherever possible, We shall indicate the mandatory and the optional fields. You shall always have the option to not provide Your Personal Information/ Sensitive Personal Information by choosing not to use a particular service or feature on the Digital Platform.

By using the Services and the Digital Platform, it would be deemed that You had given specific consent to us to collect, store, analyze, use, and otherwise exploit (including for commercial reasons) Your Personal Information and Sensitive Personal Information. While You can browse some sections of the Digital Platform without being a registered member as mentioned above, certain activities (such as availing of loans from the Company’s Lending Partner(s) on the Digital Platform) require registration and for You to provide the above details. The Digital Platform shall clearly display the Personal Information and Sensitive Personal Information it is collecting from You, and You have the option to not provide such Personal Information/ Sensitive Personal Information. However, this will limit the services provided to You on the Digital Platform.



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Further, You specifically consent to share Your Sensitive Personal Information and Personal Information for the usage of Services on the Digital Platform.

2.2 Collection of SMS/ WhatsApp Messages/ Messages with Financial Information- We don't collect or store Your personal SMS/ WhatsApp Messages/ Messages. However, We (through the Digital Platform) may collect, store, analyze, and process, Your SMS/ WhatsApp Messages/ Messages containing financial information/ data to the Digital Platform's/ Our servers, which helps us in identifying the various bank accounts, financial status and repayment capacity, for the purpose of performing credit risk assessment, assessing Your credit worthiness, and assigning a line of credit faster.

2.3 Collection of Mobile Number and E-mail Address- When You sign up with us, We collect Your mobile number and email address to uniquely identify You. This helps us ensure that no unauthorised device or person is acting on Your behalf.

2.4 Collection of Location- We may collect and monitor the location information from Your Device to provide more suitable products and more efficient services. This may also help us to verify Your location/ address and make a better credit risk decision.

2.5 Collection of Contact Details of the References Provided by You- As a part of the digital journey, We require contact details of the references to whom You can refer to Company, to whom Company or its Lending Partner(s) can reach out for verification/ reference purposes to process Your loan proposal. Any references which You may provide us, or We receive from You (in whatever mode) may be used for such commercial purposes as We may require in good faith, based on the consent provided by You.

2.6 Storage- We require storage information permission so that You can upload photos and/or documents to complete Your onboarding journey.

2.7 Camera- We may require camera access so that You could easily scan any document or scan any QR code to initiate due diligence from Know Your Customer ("KYC") perspective or payment or video verification or verification of KYC documents and other documents.

2.8 Collection of Usage Information- We automatically track certain information about You based on Your behaviour on the Digital Platform. We use this information to do internal assessment of Your demographics, interests, and behaviour to better understand, protect and serve You as an user and improve the Services offered by Company or its Lending Partner(s). This information is compiled and analysed, including on an aggregated basis. We also collect Your Internet Protocol (IP) address and the URL used by You to connect Your computer to the internet, etc. This information may include the URL that You just came from (whether this URL is on the Platform/ Website or not), which URL You next go to (whether this URL is on the Digital Platform/ Website or not), Your computer browser information, and Your IP address.

We will use Cookies on the Digital Platform/ Website like other lending websites and online marketplace websites. Use of such information helps us identify You/ Your preferences in order to make the Digital Platform/ Website/ App 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 the Digital Platform/ Website/ App. Please do refer to the section on Cookies later for more detail on this.

If You choose to select any product through the Digital Platform/ Website. We collect information about Your product choices and preferences. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. If You send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about Your activities or postings on the Digital Platform/ Website. We collect such information into a file specific to You.

3. PURPOSE, USAGE AND DISCLOSURE OF THE COLLECTED INFORMATION

3.1 The primary purpose of collecting Your information is to provide You with the Services. We access, store and use the information We collect to provide the Services, research and develop new ones. We use



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Your Personal Information, Sensitive Personal Information and other Collected Information to provide the services You request, customize Your user experience and improve Our services.

To the extent We intend to use Your Personal Information/ Sensitive Personal Information to market/ propose any product to You, We will provide You with the ability to opt-out of such uses. In Our efforts to continually improve Our product and service offerings, We collect and analyze demographic and profile data about Our users' activity on the Digital Platform/ Website. We will use and retain Your information for such periods as necessary to provide You with the Services, comply with Our legal/ regulatory obligations, resolve any disputes, and enforce Our agreements/ contractual rights.

3.2 Company may use and disclose the Collected Information (to its representatives and its Lending Partner(s)/ Agent(s) etc.) in the various ways to achieve the objectives such as the following:

- (i) To register You as a user of the Digital Platform.
- (ii) To establish identity and verify the same.
- (iii) To monitor, improve and administer the Digital Platform.
- (iv) To provide the Services offered by us or by the Company's Lending Partner(s) including credit profiling for the purpose of facilitating loans to You.
- (v) To design and offer customized products and services offered by the Company's third- party Lending Partner(s).
- (vi) To analyse how the Digital Platform/ Website/ App is used, diagnose service or technical problems and maintain security.
- (vii) To send communications notifications, information regarding the products or services requested by You or process queries and applications that You have made on the Digital Platform/ Website.
- (viii) To manage Our relationship with You and inform You about other products or services which as per us may be useful to You.
- (ix) To conduct data analysis in order to improve the Services/ Products provided to You or a Customer.
- (x) To use the Collected Information in order to comply with the applicable laws and regulations.
- (xi) To conduct Your due diligence including KYC due diligence for the Company's third-party Lending Partner(s) based on the information shared by You.
- (xii) To use the Collected information in other ways permitted by law to enable You to take financial services from the Company's Lending Partner(s).
- (xiii) To detect and protect us against suspicious or illegal activity, fraud and other criminal activity.
- (xiv) To resolve disputes or troubleshoot problems.

3.3 In addition to the above, the Collected Information may be used by us for the following purposes:

- (i) To provide personalised offers.
- (ii) To manage Our relationship with You, including notifying You of changes relating to any of the Services.
- (iii) To administer and protect Our business and the Digital Platform, including troubleshooting, data analysis, system testing, and performing internal operations.
- (iv) To deliver content.
- (v) To send You communication, including through WhatsApp business messages, in relation to Your use of the Digital Platform or the Services.



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- (vi) To monitor trends so we can improve the Digital Platform and the Services.
- (vii) To improve Our business and delivery models.
- (viii) To perform Our obligations that arise out of the arrangement the Company and its Lending Partners are about to enter or have entered with You.
- (ix) To enforce Our Terms and legal requirements.
- (x) To perform collection related activities.
- (xi) To undertake marketing services, including sending You promotional messages.
- (xii) To respond to court orders, establish or exercise Our legal rights, or defend Ourselves against legal claims.

3.4 Company will not use the Collected Information for any purpose other than in connection with the Digital Platform or beyond the provisions of this Policy.

Company will not rent, sell or share the Collected Information and will not disclose any of Personal Information or Collected Information to third parties, unless:

- (a) it is pursuant to obtaining Your consent.
- (b) it is in connection with the Services being rendered through the Digital Platform.
- (c) it is to help investigate, prevent or take action regarding unlawful and illegal activities.
- (d) it is to investigate suspected fraud, potential threat to the safety or security of any person, violations of the Digital Platform's/ Terms & Conditions, or as defence against legal claims.
- (e) if it forms part of the information, Company shares with advertisers on an aggregate basis.

However, Company shall not share/ disclose Your Sensitive Personal Information to any third party unless it has Your prior permission, or You have agreed for the same with us.

4. SHARING OF INFORMATION

As mentioned in this Policy, any or all information pertaining to You, whether provided directly by You or not, may be shared by us with the following in order to render appropriate Services to You:

- (a) The Company's affiliate or subsidiaries or any company that it intends to merge with or acquire.
- (b) The Company's Lending Partner(s) in order to provide the Services to You or develop new products.
- (c) Credit Bureau and other third parties (including collection agencies) are involved directly or indirectly in providing services or in running Our business operations. This may include but not be limited to Our Lending Partner(s), storage providers, data analytics providers, consultants, lawyers, and auditors.
- (d) Where Company is required by any applicable law, any court, a government agency, or authority to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or the Terms, or in order to comply with any applicable laws and regulations.
- (e) The acceptance of this Policy by You authorizes the Company, the Company's Lending Partner(s), its affiliates/ agents/ representatives and subsidiaries to contact You via SMS email, phone, or otherwise regarding the Services or any promotional offers.

5. ACCESS AND UPDATE YOUR INFORMATION



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By providing any information/ documents on the Digital Platform, You, hereby, confirm, undertake, and warrant that all such information that You provide us is accurate, up-to-date, and true.

6. DATA SECURITY

Company implements appropriate security measures to protect Your information from unauthorised access, and follow standards prescribed by the applicable law. Company uses appropriate security based on the type and sensitivity of data being stored. As with any internet-enabled system, there is always a risk of unauthorised access, so it's important to protect Your password and to contact us if You suspect any unauthorised access to Your account.

Company take appropriate security measures such as using Hypertext Transfer Protocol Secure (“HTTPS”) to transfer Your data to protect against unauthorised access, alteration, disclosure, or destruction of Your personal data that it collects and stores. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so Company cannot guarantee that communications between You and the Company/ Digital Platform, the Services, or any information provided to it in connection with the data collected through the Services will be free from unauthorised access by third parties. Your password is an important part of Our security system, and it is Your responsibility to protect it. You should not share Your password with any third party, and if You believe Your password or account has been compromised, You should change it immediately.

7. DATA RETENTION

7.1 You agree and acknowledge that Your information will continue to be stored and retained by us for as long as necessary to fulfill our stated purpose(s) or for a reasonable period after termination of Your account on the Digital Platform or access to the Services, whichever is later.

7.2 Criterion For Determining Data Retention Period

It is not possible for us to determine a specific period for which Company may retain Your data. However, Company will use and retain Your information for such periods as necessary to provide You with the Services, comply with Our legal/ regulatory obligations, resolve any disputes, and enforce Our agreements/ contractual rights. Company will retain Your data for longer than necessary, taking into account the following:

- (a) The purpose(s) and use of Your data, both now and in the future (such as whether it is necessary to continue to store that information in furtherance of Our obligations under a contract with You, or to contact You in the future);
- (b) Whether Company have any legal obligation to continue processing Your data (such as any record-keeping obligations imposed by any applicable law);
- (c) Whether Company have any further legal basis to continue processing Your information (including Your consent);
- (d) Whether there is any relevant agreed industry practice on how long such data should be retained;
- (e) The levels of risk and liability involved for us to continue holding the data;
- (f) The amount of difficulty Company may face to ensure the data can be kept updated and accurate; and
- (g) Any other circumstances, such as the nature and status of the Company's and the Company's Lending Partner(s)'s relationship with You.

8. COOKIES POLICY

8.1 What are Cookies?



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Cookies are small text files stored by Your browser as You browse the internet. They can be used to collect, store, and share data about Your activities across the Digital Platform, including the Website/ App. Cookies also allow us to remember parameters/ credentials pertaining to Your visits to the Digital Platform of the Company, like Your account ID, and to make the Digital Platform easier to use.

Company uses both types of cookies, i.e. the Session Cookies (which expire after a short time or when You close Your browser) and the Persistent Cookies (which remain stored in Your browser for a set period of time). Company uses the Session Cookies to identify You during a single browsing session, like when You log into the Website. Company uses the Persistent Cookies where it needs to identify You over a longer period, like when You request that the Digital Platform should keep You signed in.

8.2 Why does the Digital Platform/ Company use Cookies and similar technologies?

Company uses Cookies and similar technologies like web beacons, pixel tags, or local shared objects (also referred to as “Flash Cookies”), to deliver, measure, and improve the Services offered by us or by the Company’s Lending Partner(s) in various ways. Company uses these Cookies both when You visit the Platform and the Services through a browser and through the Website/ App. As Company adopts additional technologies, Company may also gather additional data through other methods.

8.3 Uses of the Cookies by the Company

8.3.1 Authentication and Security- The Cookies help authenticate Your access to the Digital Platform and prevent unauthorised parties from accessing Your accounts. The Cookies may be used for the following purposes:

- (a) To log You into the Digital Platform.
- (b) To protect Your security.
- (c) To help detect and fight spam, abuse, and other activities that violate the Digital Platform’s terms and conditions.

8.3.2 Preferences- The Cookies help us remember the program/ offer You are interested in, so Company can provide communication relevant to such program/ offer each time You visit the Digital Platform. The Cookies may be used for the following purposes:

- (a) To remember data about Your browser and Your preferences
- (b) To remember Your settings and other choices You have made.

8.3.3 Analytics and Research- The Cookies help Us test different versions of the Platform/ Company to see which features or content, users prefer, web beacons help us determine which email messages are opened, and Cookies help us see how You interact with the Platform, like the links You click on. The Cookies may be used for the following purposes:

- (a) To help us improve and understand how people use the Platform.
- (b) For other purposes We may want to use/analyse Your data.
- (c) We also work with a number of analytics partners, including Google Analytics, Hotjar and Mixpanel, who use Cookies and similar technologies to help us analyse how users use the Services, including by noting the sites from which You arrive. Those service providers may either collect that data themselves or We may disclose it to them.

8.3.4 Personalised Content- The Cookies help us show a personalised list of recommended programs/ offers on the homepage. The personalised content may be used to customise Company with more relevant content.



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8.3.5 Advertising- While using Your Device, You may also receive tailored in-app advertisements. Apple iOS, Android OS, and Microsoft Windows each provide its own instructions on how to control in-app tailored advertising. For other devices and operating systems, You should review Your privacy settings or contact Your platform operator to provide You with more relevant advertising. However, please note that where advertising technology is integrated into the Services, You may still receive advertising on other websites and applications, but it will not be tailored to Your interests.

8.4 What are Your Privacy Options?

You have a number of options to control or limit how Company and its Lending Partner(s) use Cookies: **(a)** Most browsers automatically accept Cookies, but You can change Your browser settings to decline Cookies by consulting Your browser's support articles. If You decide to decline Cookies, please note that You may not be able to sign in, customise, or use some interactive features in the Services.

(b) Flash Cookies operate differently than browser Cookies, so Your browser's cookie-management tools may not remove them.

9. TRANSFER OF INFORMATION

Company complies with applicable laws in respect of storage and transfer of Your information. Please note that Your financial data available with/ provided to Company is only stored on the servers/ systems located in India.

10. LINKS TO THIRD PARTY WEBSITES

The Services offered by Company or its Lending Partner(s) may, from time to time, contain services provided by or links to and from the websites of the Company's Lending Partner(s)'s networks, service providers, financial institutions, advertisers, and affiliates ("**Third Party Services**"). Please note that the Third Party Services that may be accessible through Our Services are governed by their own privacy policies. Company does not accept any responsibility or liability for the policies or for any information that may be collected through such Third Party Services. Please check their policies before You submit any personal data to such websites or use their services.

11. BUSINESS TRANSITIONS

You agree and acknowledge that in the event Companies goes through a business transition, such as a merger, acquisition by another organisation, or sale of all or a portion of Our assets, Your personal data might be among the assets transferred.

12. YOUR RIGHTS

You have certain rights with respect to use of Your data, including Your discretion to opt out of promotional emails, Cookies, and collection of Your data by certain analytics providers. You can update or terminate Your account registered with us for the Services and can also contact us for individual rights requests about Your personal data such as to restrict Our processing of Your data, to erase all data Company has stored about You, and the right to ask for the data to be provided to You.

12.1 Your Choices About the Provision and Use of Your Data

(a) You can choose not to provide certain data/ information to us, but You may not be able to use certain features of the Services.

(b) To stop receiving promotional communications from us, You can opt out by using the unsubscribe mechanism in the promotional communication You receive or by changing the email preferences in Your account. Note that regardless of Your email preference settings, We will send You transactional and



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relationship messages regarding the Services, including administrative confirmations, order confirmations, important updates about the Services, and notices about the Company's policies.

(c) The browser or Device, which You use, may allow You to control Cookies and other types of local data storage. Your Device may also allow You to control whether location or other data is collected and shared.

12.2 Accessing, Updating and Correcting and Deleting Your Personal Data- You can access and update Your personal data that Company collects and maintains as under:

(a) To update data You provide directly, log into Your account and update Your account at any time.

(b) To terminate Your account:

- If You are a user, write to compliance@loankuber.com to delete Your account permanently. We shall act on Your request within maximum 30 working days.
- Please note that, even after Your account is terminated, some or all of Your data may still be visible to others, including without limitation any data that has been (a) copied, stored, or disseminated by other users; (b) shared or disseminated by You or others (including in Your shared content); or (c) posted to a third-party platform. Even after Your account is terminated, We may retain Your data for as long as We have a legitimate purpose to do so (and in accordance with applicable law), including to assist with legal obligations, resolve disputes, and enforce our agreements. We may retain and disclose such data pursuant to this Privacy Policy after Your account has been terminated.

(c) To request to access, correct, delete Your personal data, or to restrict processing of Your personal data, please email to compliance@loankuber.com We shall act on Your request within maximum 30 working days. For Your protection, We will require that the request be sent through the email address associated/ registered with Your account, and We may need to verify Your identity before implementing Your request. Please note that post deletion, we may retain certain data for which We have legal rights/ obligations to do so, including for mandatory record-keeping and to complete transactions.

12.3 Withdrawal of Consent- You may withdraw Your consent given for collecting any information and personal data under this Privacy Policy and pursuant to use of the Services, at any time by sending an email to compliance@loankuber.com. We shall act on Your request within maximum 30 working days.

In case of withdrawal of Your Consent or deletion of Your Personal Data, Company reserves the right to not allow You further usage of the Platform/ Website or to not to provide/ use any Services thereunder, without any obligations or liability, whatsoever, whether in contract, tort, law, equity or otherwise, in this regard. Further, please note that such withdrawal of consent shall be prospective in nature, and shall not affect the lawfulness of any data processed based on Your consent given prior to withdrawal.

13. CHANGE IN PRIVACY POLICY

Company may amend the Privacy Policy time to time, at its sole discretion. Any changes shall be deemed effective immediately upon publishing of the updated modified Policy on the Digital Platform/ Website and any continuous usage of the Services, following the modification will indicate acceptance of changes in Policy by You.

14. GRIEVANCE OFFICER

You may contact the Company's Grievance Officer with any enquiry relating to this Policy or Your personal data. Details of the Grievance Officer for this purpose are as under:



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- **Mr. Saurabh Nagpal, The Grievance Redressal Officer, Janasha Finance Private Limited, 1004, 10th Floor, Arunachal Building, Barakhamba Road, Connaught Place, New Delhi - 110001**
- Email: compliance@loankuber.com;

15. UPDATES & CONTACT INFO

From time to time, Company may update the Privacy Policy at its sole discretion. If this Policy is updated, Company will notify You by posting the policy on our site with a new effective date. If any material changes are made, Company will take reasonable steps to notify You in advance of the planned change.

If You have any questions about Your data, our use of it, or Your rights, You may contact us at the following contact details:

Email: Compliance@loankuber.com.