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## PRIVACY TECHNOLOGY POLICY

Current Version No: 6.0
Current Version Approval Date: 8 <sup>th</sup> September 2024
Current Version Effective Date: 1 <sup>st</sup> October 2024

## 1. Purpose and Scope

This Data Privacy and Protection Policy outlines our commitment to managing, protecting, and processing personal data in alignment with the Digital Personal Data Protection (DPDP) Act, 2023 and relevant guidelines issued by Reserve Bank of India. The company also takes guidelines from CERISE and Client Protection Pathways frameworks.

This policy applies to all personal data collected, processed, and stored by UC Inclusive Credit Private Limited (UCIC/ the Company) during the course of its business operations, and extends to its all trainees, employees, employers, Board Members, Observers, Advisors, Consultants, Auditors, contractors, partners, customers and any other person who either inadvertently or in the course of its dealings with the Company, obtains or collect any restricted personal data from the database of the Company.

## 2. Data Privacy and Protection Principles

UCIC shall strictly adhere to the data protection principles as below:

- 2.1. **Lawfulness, Fairness, and Transparency:** UCIC is committed to processing all personal data in a lawful, fair, and transparent manner. UCIC shall ensure that every data processing activity is backed on a legal basis, such as consent or a contractual obligation. Transparency shall be maintained by providing clear, accessible, and understandable information to data subjects about how their data would be used, and ensuring their rights are easily exercised.
- 2.2. **Purpose Limitation:** UCIC shall collect personal data strictly for identified, explicit, and legitimate purposes. Data shall not further processed in any manner that is incompatible with those purposes. UCIC shall clearly inform the data subjects about these purposes at the point of collection to ensure informed consent and understanding.
- 2.3. **Data Minimization:** UCIC shall adhere to the principle of data minimization, ensuring that only data that is necessary for the intended purposes is collected and processed. This minimizes privacy risks and ensures that no excessive data is retained.
- 2.4. **Accuracy & Authenticity:** Accuracy of personal data is paramount. UCIC shall have mechanisms in place to ensure that inaccurate, incomplete, obsolete or outdated data is amended or deleted promptly. Data subjects are encouraged and facilitated to update their data periodically to ensure that it remains accurate and current.
- 2.5. **Storage Limitation:** UCIC shall retain personal data for a limited period, only as long as necessary to fulfill the purposes for which the data was collected or to comply with legal, regulatory or policy requirements. A data retention procedure shall be followed to ensure that data is securely deleted, anonymized, or archived after the retention period.
- 2.6. **Integrity and Confidentiality:** Personal data shall be protected by suitable security measures designed to prevent unauthorized access, alteration, disclosure, or destruction. These include technological, organizational, and procedural measures such as encryption, access controls, using authentic anti malware/ virus software or programmes and staff training to ensure the confidentiality and integrity of data.
- 2.7. **Accountability:** UCIC are committed to being accountable for its data protection practices. UCIC shall have internal policies, procedures, and controls in place to ensure and demonstrate compliance with data protection principles. These include regular audits and training.

## 3. Data Collection and Processing

UCIC is committed to:

- 3.1. Informing individuals regarding their data's collection and processing.
- 3.2. collecting data only for specific and legitimate purposes.
- 3.3. Ensuring data accuracy and updating it as necessary.
- 3.4. Storing data securely to maintain its confidentiality.

## 4. Data Subject Rights

UCIC respect data subject rights including:

- 4.1. Access to personal data
- 4.2. Rectification of inaccurate data
- 4.3. Restricting data processing

- 4.4. Data portability
- 4.5. Objection to processing.
- 4.6. Not being subject to automated decision-making

## **5. Security**

UCIC shall have security measures to protect personal data, including:

- 5.1. Assigning the appropriate classification for Personally Identifiable Information data
- 5.2. Implementing clearly defined role and function-based access controls
- 5.3. Encrypting data during transmission and at rest.
- 5.4. Masking and redacting PI as per requirements to ensure enough access control and protection.
- 5.5. Regularly monitoring and testing security protocols.
- 5.6. Establishing incident response and breach notification procedures.
- 5.7. Identification and Classification of Information Assets
- 5.8. For key personnel with intimate knowledge and access to systems a comprehensive background check and screening is to be initiated
- 5.9. The incident of Data breach or security breach if any needs to be defined and reported along with necessary steps to be taken to prevent such incidents in the future

## **6. Third-Party Processors**

UCIC shall take steps to ensure that third-party processors adhere to the Company's data protection and privacy requisites.

## **7. Data Privacy Impact Assessments (DPIA)**

DPIAs are conducted for processing operations that pose specific risks to data subjects' rights and freedoms and to assess the overall privacy impact that UCIC may have.

## **8. Training and Awareness**

Employees shall receive periodic training as per the information security and privacy awareness policy.

## **9. Cookies**

Third parties may place cookies on specific pages; UCIC shall not control their cookie usage. However, UCIC may use cookies at its website/ webpage to enhance user's/ visitor's experience. One may configure the browser to refuse or alert about cookies, but this may affect website functionality. The Website/ webpage of the Company shall exhibit following disclaimer before admitting any user/ visitor:

## **10. Website Disclaimer**

UCIC use cookies to gives the users the best possible experience with ucinclusive.in. Some are essential for the site to function; others help the company understand how the users use the site, so the company can improve it. UCIC may also use cookies for targeting purposes. The website will provide option for the users to accept the cookie policy or exit the site.

## **11. Review and Revision**

UCIC may, at its discretion, may make changes to this Privacy Policy to reflect updates in its business processes, upgrades in privacy standards and procedures, or to implement applicable legislative or regulatory changes.

Any such policy changes shall be effective from the date of posting the same on the Company's website, and notification of these changes shall be published on the website. This policy is subject to annual review or updates upon significant changes in data processing activities.

## **12. Contact Information**

For queries or concerns, one can write to [grievanceredressal@ucinclusive.com](mailto:grievanceredressal@ucinclusive.com) and the team should respond to the same within 7 working days.