



LOLC India Finance Private Limited

PRIVACY POLICY

Version 2.0

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Introduction

LOLC Finance Private Limited (referred as “LOLC”) is committed to protecting their customer’s

personal information. This Privacy Policy is created to help the customer understand how LOLC collects, uses, protects, shares, discloses, transfers, stores and disposes customer's information when they visit LOLC's website/ Branches/ digital applications/ platforms and various data collection points used during the use of products and services of LOLC.

The customer is advised to read this Policy before navigating the website and other digital applications/ platforms.

This Privacy Policy covers the following topics:

1. Personal Information Collected Online/offline:
2. How is Personal Information used
3. How Personal Information is Shared
4. How is Other Information Used and Collected
5. How is Customer information kept accurately
6. How access to Customer Information is limited to employees
7. Information Security
8. Other Information about LOLC India Website

1. Personal Information collected online/ offline

LOLC and their third-party service providers /Business Correspondents (BC) / Lending Service Providers (LSP's) may collect personal Information in a variety of ways, including:

Personal Information means personally identifiable information such as information customer provides via forms, surveys, applications or other online fields including name, postal or email addresses, photograph, telephone, fax or mobile numbers, Bank account details, signature, KYC documents, device and location data.

The Personal Information shall be collected on need to know basis and only for providing products/ services requested by the customer.

2. How is personal information used

LOLC may use Personal Information:

- I. To respond to customer's inquiries and fulfil requests.
- II. To inform customer's about important information regarding the website, products or services for which the customer applies or may be interested in applying for, or in which customer is already enrolled, changes to terms, conditions, and policies and/or other administrative information.
- III. For authenticating the identity of the customer including but not limited to Aadhaar, PAN or any other identity document and to process or execute transactions
- IV. To deliver marketing communications that LOLC believe may be of interest to customer, including, advertisements or offers tailored to customer's.
- V. To personalize customer's experience on the website.

- VI. To allow customer's to apply for products or services (e.g., to apply for loan or any other financial product)) and evaluate customer's eligibility for such products or services, undertake requisite credit assessment and obtain credit information reports.
- VII. To verify customer's identity and/or location (or the identity or location of customer's representative or agent) in order to allow access to customer's accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information.
- VIII. To contact the customer as well as provide customer service
- IX. To allow customer's to participate in surveys and other forms of market research, sweepstakes, contests and similar promotions and to administer these activities.
- X. To allow customer's to use some Site financial planning tools. Information that customer enters into one of these planning tools may be stored for future access and use.
- XI. For business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns.
- XII. For risk control, for fraud detection and prevention, KYC/ AML checks, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.
- XIII. For fulfilling any regulatory or legal requirements applicable to LOLC

LOLC's applications/ interface may require one-time access to your mobile phone resources such as camera, microphone, location, or any other facility necessary for the purpose of on-boarding/ know-your-customer (KYC) requirements. Such access shall only be obtained after seeking your consent. However, LOLC shall in case of digital lending ensure that the applications desist from accessing resources on your mobile phone such as, file, media, contact list, call logs, and telephony functions.

LOLC shall not collect/ store your biometric information in the systems associated with LOLC's applications or the third-party vendor applications unless permitted under applicable law. LOLC shall ensure that its applications or our third-party vendors/ business correspondents (BCs)/ lending service providers (LSPs) engaged to provide products/ services to the customers will not store Personal Information except information such as, but not limited to, name, address, contact details, that may be required to carry out operations.

It shall be the responsibility of the customer to ensure that all the Personal Information provided to LOLC is accurate and up-to-date.

3. How personal information is shared

LOLC will ensure that the Information shall not be shared with any external organization unless the same is necessary to enable LOLC to provide services to the customer's or to enable the compilation of a transaction, credit reporting, or the same is necessary or required pursuant to applicable lending norms or pursuant to the terms and conditions applicable to such Information as agreed to with LOLC. Needless to add, confidentiality norms as applicable to LOLC shall be adhered to. LOLC may also share Information to provide customer with superior services and a range of offers.

LOLC shall share Personal Information, without obtaining customer's consent or without intimating the customer: (a) with governmental, statutory, regulatory, executive, law-enforcement, investigating or judicial/ quasi-judicial authorities, departments, instrumentalities, agencies, institutions, boards, commissions, courts, tribunals, who ask for such Personal Information including by way of an order, direction, etc; or (b) with any person, where disclosure is necessary for compliance of any legal or regulatory obligation. Wherever the Personal Information is shared as above, we will not have control over how such Personal Information is further processed by such authorities, persons, etc.

To the extent permitted by regulatory guidelines, LOLC may share Personal Information with LSPs/ BCs/ co-lenders and such other service providers with whom LOLC may have an arrangement with for any services/ products. Kindly note that the list of LSPs/ BCs & digital lending applications (DLAs) and collection & recovery agents authorized by the LOLC to process personal information can be accessed on the website of LOLC.

While doing so, LOLC is committed to comply with regulatory guidelines, statutory laws, confidentiality clauses and the terms and conditions agreed with the customer. We will take reasonable steps to ensure that these third-party service providers are obligated to protect your information and are also subject to appropriate confidentiality/non-disclosure obligations and they comply with the applicable provisions of the data protection laws.

4. Log and retention/storage of Personal Information

In accordance with applicable laws/ regulatory requirements and internal policies/ contractual obligations, LOLC shall retain/ store Personal Information for the period necessary to fulfil the lawful business purposes outlined in this Policy unless a longer retention period is required or is permitted by law/ regulatory body.

LOLC may engage the services of reputed third-party service providers for record/ data storage/ management purposes under SLAs agreed by LOLC with such third parties in writing. Such SLAs would cover aspects of client data confidentiality and related compliance requirements.

If the retention/ storage of customer information is not required, we have deployed policies and procedures to destroy or delete such customer information on a best effort basis.

Contact Information/ Handling Privacy Concerns

In order to address any discrepancies or grievances related to the Personal Information residing with LOLC, the customer may contact the Grievance Redressal Officer. The details of the Grievance Redressal Officer are published on the website.

5. How the other information is collected and used:

LOLC and their third-party service providers /BCs / LSPs may collect and use Other Information in a variety of ways, including:

- I. **Through customer's browser or device:** Certain information is collected by most browsers and/or through customer's device, such as Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. LOLC uses this information to ensure Sites function properly, for fraud detection and prevention, and security purposes.
- II. **Using cookies:** Cookies are pieces of information stored directly on the device, customer is using. Cookies used by LOLC do not contain or capture unencrypted Personal Information.

Cookies allow LOLC to collect information such as browser type, time spent on the Site, pages visited, language preferences, and customer's relationship with LOLC. LOLC uses the information for security purposes, to facilitate navigation, to display information more effectively, to personalize/ tailor customer's experience while engaging with LOLC. LOLC collects statistical information about the usage of the Site in order to continually improve the design and functionality, to monitor responses to advertisements and content, to understand how account holders and visitors use the Site and to assist LOLC with resolving questions regarding the Site. LOLC uses encrypted cookies.

- III. **IP Address:** IP Address is a number that is automatically assigned to the device that customer is by his Internet Service Provider (ISP). An IP Address is identified and logged automatically in LOLC's server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many web sites. LOLC use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, for compliance and security purposes, for advertising, and administering the Site.
- IV. **Aggregated and De-identified Data:** Aggregated and De-identified Data is data that LOLC may create or compile from various sources, including but not limited to accounts and transactions. This information, which does not identify individual account holders, may be used for LOLC's business purposes, which may include offering products or services, research, marketing or analyzing market trends, and other purposes consistent with applicable laws.

Further, LOLC may collect information from third party e-mail in customer's account (inclusive of potential customer) (EMAIL ACCOUNT DATA)

- a) Subject to customer's consent, LOLC may request certain third parties sending e-mails /SMS by providing information about customer , to provide information which could help us to customize and personalize customer's experience of our Services.
- b) If customer choose to link and connect email account/SMS with our application, LOLC may access the said account for purposes such as collecting customer's financial, institutional and transactional information to be able to organize information in customer's e-mail account/SMS and provide deep analytics.
- c) LOLC shall seek customer's consent and request access to customer's email account/SMS. If permitted, the application shall automatically secure access to the contents of emails on an ongoing basis for the purpose of providing an in-depth view of your net worth on a regular basis.
- d) The Application's access to customer's email account(s) is authorized through the email provider's access mechanism. Customer can choose to enable us to access one or more of customer's email accounts by explicitly consenting to each single account separately. Please note that customer's consent to any of the above is purely voluntary. Customer may de-link and stop the access to his/her email account/s any time he/she wishes
- e) LOLC shall only read emails from financial and institutional service providers including, but not limited to, banks and credit card issuers and do not open, read or access any personal (non-institutional) emails. LOLC hereby confirm that LOLC shall not access any other personal emails. This distinction is made based on the sender email address.
- f) Please note that such data obtained by this integration will be used by LOLC solely for providing the Services, populating, tracking and updating the User's investment information on

a monthly/ quarterly / annual basis and on user demand of those investments made through the account including those on the platform and consolidate them at one place, providing accurate analytics on the User's spent pattern and further improving the User experience pertaining to the features of the Platform and consolidate user's investment details and history. LOLC shall not use or transfer any data or information received from the integration of customer's email addresses with the account on the Platform, to third parties for any purpose other than as explicitly authorised by the User.

g) The Services shall not use customer's Email data for serving advertisements.

h) The Services shall not allow humans to read this e-mail data unless LOLC has your affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for the App's internal operations and even then, only when the data have been aggregated and anonymized.

i) Customer's may at any time opt to de-link customer's email addresses connected with the account opened on the Platform, by managing these connections with the options provided on the platform.

6. How is customer's information kept accurately

It is in customer's interest, and it is LOLC's objective, to have accurate, current, and complete information concerning customer and his accounts. LOLC has strict procedures that their employees abide by to meet this objective. While some procedures are required by Central, State laws or RBI regulations, LOLC has implemented additional procedures to maintain accurate, current, and complete personal and financial information, including processes to update information as and when submitted by its customers.

7. How access to customer's information is limited to employees

The Personal Information collected by LOLC is shared with employees on a need-to-know basis. LOLC has procedures that limit access to Personal Information to those employees with a business reason for knowing such information about customer. LOLC educates the employees on their responsibility to protect the confidentiality of customer information, and hold them accountable if they violate this privacy policy.

8. Review/ Amendments in the Policy

- LOLC may amend the Policy from time to time and post the updated version of the same on the website.
- In the event where there is conflict between this Policy and the RBI regulations/ Statutory guidelines, the latter shall prevail.
- The updated Policy shall be effective as soon as it is published on the website/ respective apps/ platforms.

Note: If a customer uses our website or Apps, platforms or make any application/ request for any Product or use any Product or make any service requests for or during usage of any Product or if the customer uses any functionality provided by or for us, such act of any of aforesaid users shall by itself amount to your acceptance of the Policy with changes if any.

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