

# Privacy Policy

Goyal Associates Limited, referred to as "Goyal Associates," "We," "Our," or "Us," is a limited company incorporated in India (CIN: L74999GJ1994PLC023281), with its Registered office located at 401, Phoenix Complex, Waghodia Road, Vadodara, Vadodara, Gujarat, India, 390019. Goyal Associates operates as a Non-Deposit Taking Non-Banking Financial Company registered with the Reserve Bank of India ("RBI"). We offer loans through various channels, including websites, digital lending applications ("DLAs"), and platforms, which are either owned and operated by Goyal Associates or belong to its Lending Service Providers ("LSPs").

The purpose of this Privacy Policy is to provide you, the user ("You", "Your", or "User"), with information on how Goyal Associates, LSPs, or any platform owned by Goyal Associates collect, store, use, disclose, transfer, and processes your personal information (defined below) when:

- (a) You use our websites ("Websites"),
- (b) Goyal Associates previously offered lending services on DLAs such as "SalaryDay," owned and operated by Goyal Associates Limited and hosted on <https://salaryday.in/>,
- (c) Our New LSP, DLA "RupieQuicker," owned and operated by Rupee Quicker Technologies Private Limited and hosted on <https://www.rupiequicker.com/#/>,
- (d) You utilize other loan sourcing websites and applications to avail lending services ("Services").

**Users are advised to review this Privacy Policy in conjunction with the terms of use and other information provided on the website/applications. It's important to note that any statements made on website/applications should not be interpreted as offers or promises for the provision of financial services.**

## CONSENT:

By continuing to use the Website/App and availing the Services, you expressly agree to provide the information mentioned below to Us for the purpose of delivering the Services to You. If you disagree with any terms mentioned herein, please refrain from using the Services. This Privacy Policy delineates our policies and practices concerning the gathering, utilization, and disclosure of your information for users who consent to access the Website/App and utilize the Services.

## UPDATES TO PRIVACY POLICY:

Our Privacy Policy may undergo periodic updates, and Goyal Associates will not provide individual notices for these changes. You can view the updated Privacy Policy on our Website. We recommend that you regularly review the Website to stay informed about our latest privacy practices. By accessing or using the Website after any changes to the Privacy Policy have been posted, users are bound by the updated terms.

It's essential for you, as a user or customer, to regularly check this Privacy Policy for any revisions to stay informed about any modifications.

## INFORMATION WE COLLECT FROM YOU:

- **PERSONAL DATA:** For lending services, we collect various personal data points from you, including but not limited to your full name, parents' names, date of birth, gender, educational qualifications, postal code, purpose of the loan, house ownership, employment status, company name, marital status and contact information (such as mobile number, email ID, and address) and other relevant details.
- **KYC DATA:** The Know Your Customer (KYC) process is an essential part of financial services and involves verifying the identity of customers to prevent fraud, money laundering, and other illegal activities. At Goyal Associates Limited, we collect various KYC details from our customers to ensure compliance with regulatory requirements and to maintain the integrity and security of our platform. We collect identification documents issued by the government or other authorities, such as your PAN card, Aadhaar card. In addition to PAN and Aadhaar cards, we may collect other KYC details as required by regulatory authorities. This may include documents such as passport, driver's license, voter ID card, utility bills, or bank statements.
- **LOCATION:** We will collect your device approximate location to facilitate lending services, strictly in accordance with applicable laws. Your device location information will be used to verify your address and assist in the KYC and onboarding process for our services.
- **CAMERA:** In compliance with legal requirements, we may request access to your camera to facilitate lending services. Camera access is utilized for tasks such as taking a selfie and conducting a liveness check. Additionally, we may request camera access to capture the required KYC documents as per the instructions of our lending partners, ensuring compliance with applicable laws as part of the KYC and onboarding process.
- **DEVICE DATA:** Upon installing the application, we gather device-specific data using unique identifiers. We explicitly request permissions to access necessary device information during installation. Additionally, we collect log information (including IP addresses, Operating system, Device Information) via the domain server for improving application functionality. We also track performance and diagnostic data to identify and resolve technical issues, enhancing overall application functionality.
- **FINANCIAL DATA:** We collect various financial data to assess your financial health and eligibility for our services. This includes (Past Credit History, Income Details, Loan Record, Payment Records, Bank Account details, Bank Account Statements, etc..). We use this financial data to evaluate your creditworthiness, determine loan eligibility, and customize our services to meet your financial needs. It's important to note that we handle all financial data with strict confidentiality and adhere to industry-standard security measures to protect your information.

### **INFORMATION WE COLLECT FROM THIRD PARTIES:**

- i) To facilitate the Services, we may gather credit information from third parties like credit bureaus or credit rating companies, account aggregators, and financial institutions, as per applicable laws.
- ii) During the loan process, we may obtain data related to document verification, repayment status, etc., from entities such as NSDL and payment gateway providers.
- iii) Additionally, we may collect Your bank account numbers or UPI payment details for loan collection and repayment purposes.

**How we utilize this information:** We utilize this data on an as-needed basis to deliver the Services and conduct due diligence and verification of Your application.

### **INFORMATION YOU GIVE US ABOUT YOU:**

During the course of utilizing our Services, you're required to furnish data to enable our offerings. We utilize this information to establish Your profile and furnish optimal services. Below are the types of information we collect from You:

- i) Data provided through forms on the Website/App.
- ii) Correspondence data exchanged with us (e.g., via email or chat).
- iii) Information You provide during registration on the Website/App, downloading or registering on our mobile application, subscribing to any Services (e.g., loan applications), searching for a Service, or reporting issues with our Website, Services, or Apps.
- iv) Details such as Your name, address, gender, date of birth, email address, phone number, username, password, and other registration particulars.
- v) PAN Card, Aadhaar Card, financial details like employer name, monthly salary, bank account number, bank statements, credit information, GST details, and copies of identification documents necessary for onboarding applications to avail our services.

This data assists us in creating Your profiles, fulfilling mandatory KYC requirements to offer Services, approving loans, and providing tailored support for any issues.

Wherever applicable, we distinguish between mandatory and optional fields. You retain the choice to abstain from providing any information by opting out of specific services or features on the Website/App.

### **STORAGE OF INFORMATION:**

- i) Your information will be stored on servers located within India.

ii) We ensure that no biometric data belonging to You (where applicable) will be collected or stored by our DLAs or LSPs through DLAs.

iii) If any of our representatives request such data from you, we kindly ask you to refrain from providing it and address this concern to our Grievance Officer (details provided below).

iv) We ensure that LSPs engaged by us comply with all mandatory technology standards and cybersecurity requirements stipulated by RBI and other relevant agencies.

v) We retain any data or information provided by You until we have completed rendering our services to You.

vi) Our data retention policy is limited to the provision of services to You. You can request the deletion of Your information from us at any stage.

vii) Our data retention and deletion policy adhere to the applicable laws and guidelines set by the RBI.

#### **USE OF INFORMATION COLLECTED:**

i) **Providing Requested Services:** The information collected is used to provide the services you have requested.

ii) **Identity Establishment and KYC:** It is utilized to establish identity, conduct KYC (Know Your Customer), and verify compliance with applicable laws.

iii) **Dispute Resolution:** Information aids in resolving disputes and investigating violations of terms of use or defending against legal claims.

iv) **Legal Compliance:** It may be disclosed under special circumstances such as compliance with local laws, court orders, or requests from legal authorities.

v) **Creditworthiness Assessment:** Information helps in assessing your creditworthiness for providing services.

vi) **Communication:** Used to contact you when necessary via email, SMS, letter, telephone, or other means regarding products and services.

vii) **Fraud Prevention:** Helps in identifying, preventing, detecting, or tackling fraud, money laundering, terrorism, and other crimes.

viii) **Product Improvement:** Information aids in identifying, developing, or improving products of potential interest.

**ix) Administrative Purposes:** Used for administrative and operational purposes including system testing.

**x) Payment Recovery:** Utilized for recovering payments owed to us or our partners.

**xi) Regulatory Compliance:** Helps in compliance with regulatory obligations and filing records with relevant governmental authorities.

#### **DISCLOSURE OF INFORMATION:**

**i) Sharing with Partners:** We share your information with our LSPs (Lending Service Providers), partner banks, NBFCs (Non-Banking Financial Companies), and other third-party partners to facilitate loans, facilities, lines of credit etc...

**ii) Third-Party Contact:** Information may be disclosed to enable our third-party partners to contact you, respond to queries/comments, offer promotional deals, or resolve service issues for better assistance.

**iii) Tracking with Technology Partners:** Data provided by users may be shared with technology partners to track interactions with the website/App on our behalf.

**iv) Merger or Acquisition:** In the event of a merger, acquisition, or reorganization involving our assets, we may share information with other business entities. Any recipient of such information shall be bound by this Privacy Policy regarding your information.

**v) Legal Compliance:** Personal information may be shared with governmental, quasi-governmental, judicial, or quasi-judicial authorities upon request, order, or legal obligation under applicable laws. By accepting the Privacy Policy, you consent to the disclosure of your personal information for these purposes.

**vi) Conditions for Disclosure:** Disclosure to third parties is subject to certain conditions:

**(i) Legal Obligation:** We may disclose your personal data to comply with legal or regulatory obligations without seeking explicit consent, although we will endeavor to notify you accordingly.

**(ii) Express Consent:** Your express consent will be obtained before sharing personal data with third parties.

**(iii) Need Basis:** Information is shared with third parties only as needed and for the purposes stated herein, in accordance with applicable laws.

**(iv) Separate Consent:** Express consent may be sought at appropriate stages of data collection, as required by applicable laws.

**(v) Third-Party Privacy Policies:** Usage of your information by third parties is

governed by their privacy policies. We share limited information strictly as required and recommend reviewing the privacy policies of such third parties.

## **SECURITY:**

**i) Protection Measures:** The Website/App is designed to safeguard your information and maintain its accuracy. For instance, all transmitted information is encrypted over the internet, and we ensure that our registered third-party service providers also maintain the same level of protection.

**ii) Stringent Security:** Our Website/App incorporates stringent security measures to prevent loss, misuse, or alteration of information under our control. We strive to ensure the security of the information you provide us. We utilize Secure Sockets Layers (SSL) based encryption for transmitting information, adhering to the required encryption standards in India as per applicable law.

**iii) Multiple Security Layers:** Security is integrated at various stages within our products, leveraging state-of-the-art technology. Our systems are equipped with robust security measures, and our data and privacy security design enables defense against a wide range of security threats, from basic issues to sophisticated attacks.

**iv) Protection against Unauthorized Access:** We employ various measures to protect information from unauthorized access, alteration, disclosure, or destruction:

(i) Encryption is utilized to maintain data privacy during transmission.

(ii) Security features such as OTP verification are provided to enhance account protection.

(iii) Regular review of information collection, storage, and processing practices, including physical security measures, is conducted to prevent unauthorized access.

(iv) Access to personal information is restricted to employees and agents who require it for processing, and they are bound by strict confidentiality obligations.

**v) Compliance with Regulations:** We ensure compliance with regulations and applicable laws regarding data protection.

**(vi) Regular Privacy Policy Review:** The Privacy Policy is periodically reviewed to ensure that information processing aligns with its provisions.

**(vii) Data Transfers:** Proper protocols are followed for secure data transfers.

**(viii) Aadhaar Confidentiality:** Aadhaar numbers are not disclosed in any manner.

**v) Handling Complaints:** Formal written complaints are promptly addressed by contacting the complainant. We collaborate with relevant regulatory authorities, including local data

protection authorities, to resolve any complaints regarding data transfers that cannot be resolved directly with the individual.

#### **COOKIES:**

Our Website/App utilizes temporary cookies to store specific data necessary for maintaining the Website/App and its features, as well as for research and development purposes. It's important to note that we do not store any personally identifiable information in these cookies.

#### **THIRD PARTY SDKS AND OTHER SITES:**

- i) Our Website/App includes links to registered third-party SDKs, Application Programming Interface (API) integrations, and redirections that collect data on our behalf. This data is securely stored on servers. We ensure that our third-party service providers implement extensive security measures to protect your personal information in compliance with applicable laws.
- ii) Our third-party service providers implement separation of environments, segregation of duties, and strict role-based access control on a documented, authorized, need-to-use basis. The data stored by our third-party service providers is encrypted and protected. They also enforce key management services to restrict access to data.
- iii) Additionally, our registered third-party service providers ensure hosting security by employing industry-leading anti-virus, anti-malware, intrusion prevention systems, intrusion detection systems, file integrity monitoring, and application control solutions.
- iv) We do not permit unauthorized access to your non-public personal contacts or financial transaction SMS data with any third party related to Lending Services, except for our Lending Partners. However, for Non-Lending Services (Value Added Services), we may allow third parties to access your non-public personal contacts or financial transaction SMS data subject to your explicit consent.
- v) It's important to note that this Policy addresses only the disclosure and use of data collected by us. The data collection practices and policies of third parties may differ from this Policy, and we do not have control over their policies nor any liability in this regard.

#### **YOUR RIGHTS:**

**i) Modifying or Rectifying Your Information:** If any personal information provided by you is inaccurate, incomplete, or outdated, you have the right to provide us with accurate and updated data. We urge you to ensure that you always provide us with accurate information for uninterrupted use of our Services. In case of modification, you will need to furnish supporting documents for verification by Goyal Associates.

**ii) Your Privacy Controls:**

- We will provide certain choices regarding the information we collect and how it is used. For instance, you can modify permissions on your device to control the information we collect. However, exercising such controls may impact the availability of our Services.
- You can delete the App from your device.
- You can request removal of content from our servers.

**iii) Withdrawal/Denial of Consent:**

- You have the right to deny consent for specific data use, restrict disclosure to third parties, revoke consent already granted, or request data deletion. However, any denial of consent may affect our ability to continue providing Services, especially if any controls are exercised.
- You may withdraw consent for contact, data collection, use, or disclosure at any time. However, withdrawal may not affect data processing related to active credit facilities until repayment is complete or as required by law.

**iv) Access to Your Information:** You have the right to access and review the information you provided us. If you find errors or discrepancies, you can rectify them by providing accurate information. Contact our Grievance Officer for access requests, and upon verification, we will provide relevant information within a reasonable time.

**v) Grievance Redressal:** If you have complaints, contact our Grievance Officer. We will make efforts to address your concerns promptly. If unsatisfied, you may approach relevant authorities under RBI Scheme or data protection laws.

**vi) Amendment Requests:** If you believe your personal information held by us is incorrect, incomplete, or inaccurate, you may request amendment through our Grievance Officer, who will respond within a reasonable time.

**Vii)** You can opt-out of receiving communications from us by contacting us or using the unsubscribe option in our communications.

**Viii)** You may request erasure/deletion of personal data held by us if no longer necessary, subject to our retention policies and applicable laws.

**ix) Restriction:** You can restrict us from processing your personal data.

**x) Right to Object:** You have the right to object to us processing your personal data.

**xi) Right to Complain:** You have the right to lodge a complaint with the supervisory authority.

**CONTACT US:**

For any queries or grievances, you can reach out to our Grievance Officer, using the following contact details:

**Grievance Officer:** Mr. Raja Shanker

**Email:** [grievance@goyalassociateslimited.com](mailto:grievance@goyalassociateslimited.com)

Contact Number: 8977008131

Feel free to contact us with any concerns or inquiries, and we'll make every effort to assist you promptly.

Please be aware that this Privacy Policy may undergo amendments periodically without prior notice, to reflect alterations in our data management practices or for operational, legal, or regulatory purposes. We advise you to review this Privacy Policy regularly to stay informed about how we safeguard your information. We encourage you to read and consent to our Privacy Policy as necessary.