



## **PRIVACY POLICY**

PUBLISHED BY:  
MANIBHAVNAM HOME FINANCE INDIA PVT. LTD.

ADDRESS:  
N-2, Second Floor, South Extension-1  
New Delhi-11004

# PRIVACY POLICY

## 1.1 Objective

This document aims to provide a clear set of procedures on the information collected by ManiBhavnam Home Finance India PVT LTD. (“MBHF” or “We”) when you visit our website or app or page on social media platforms (individually called “platform” and together called “platforms”). While visiting our platforms, you agree to be bound this Privacy Policy.

## 1.2 Applicability

This Privacy Policy governs the manner in which MBHF collects, uses, maintains, and discloses information collected from users/visitors of its platforms.

This privacy policy applies to all products and services offered by MBHF. It applies regardless of whether you use a computer, mobile phone, tablet, or television or any other media or computer resource to access our platforms. It also applies to those who register on our platforms in connection with use of our services. It is important that you read the Privacy Policy carefully because whenever you use our platforms, your personal data will be processed (if at all) in accordance with this policy.

MBHF constantly seek to maintain the integrity of and make improvements to the Website. As part of these efforts, MBHF collect and analyse certain aggregate information about how visitors use the Website. Your right to privacy is very important. MBHF recognize that when you choose to provide us with information about yourself, you trust us to act responsibly

MBHF believe information gathered should only be used to help us provide you with better services. But due to the existing regulatory environment, MBHF cannot ensure that all your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although MBHF use industry standard practices to protect your privacy, MBHF do not promise, and you should not expect, that your personal information or private communications will always remain private.

Notwithstanding the above MBHF will not disclose any of your personally identifiable information to third parties unless MBHF have your permission

or other circumstances such as compliance with subpoenas, court orders, requests/order from legal authorities or regulators or law enforcement agencies requiring such disclosure

### 1.3 Cookies

When you visit our Website, MBHF may collect various types of technical data including (but not limited to) domain and/or Web browser information. This data is gathered using cookies and other similar tracking technologies. Cookies are small pieces of information that our server places on a visitor's computer hard drive to enable that person to more easily communicate and interact with the Website. Refer annexure – "A" – Cookie policy for details.

### 1.4 Personal Data we Collect:

Following data points are collected by our platforms:

- Name
- Phone/mobile
- emailID
- Address (City, State, Pincode)
- employment type
- Google website Analytics data

### 1.5 Personal Data Collection Sources

Personal Data, means and includes, any data relating to identified or identifiable living person ('data subject' here in referred as you/your') including but not limited to, name, telephone number, email ID, any personal details that may have been voluntarily provided by the customer, whether to Unique Identification Authority of India (UIDAI), Credit Information Bureau of India Limited (CIBIL) etc.

MBHF collect data about you or your usage to provide better services to all of our users. MBHF collect data in the following ways:

- MBHF may collect your data through campaigns and publicly available sources
- MBHF collect data about the services that you use and how you use them. This data includes log information and location information.

- When you communicate with MBHF or use the MBHF platform to communicate with other members, MBHF collect data about your communication and any data you choose to provide.
- If you choose to sign in with your social media account to access MBHF, or otherwise connect your social media account with the services of MBHF, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the information that you make available to us through the social media interface. Please see your social media provider's privacy policy and help centre for more information about how they share data when you choose to connect your account.
- MBHF does not collect Personal Data about individuals except when such individuals specifically provide such data on a voluntary basis. Upon such voluntary disclosure of Personal Data, MBHF may further verify, collate or receive data about you from publicly and commercially available sources (as permitted by law), which MBHF may combine with other data MBHF receive from you. MBHF may also receive data about you from third-party social networking services if you are already connected with those services.

## 1.6 Use of Personal Data

We will only use your information in a fair and reasonable manner, and where we have a lawful reason to do so.

- To provide you our services and products and in the course of provision, we may share your information with third-party agents/contractors we may appoint.
- To improve your user experience and the overall quality of our services. For e.g. We use your data collected from cookies and other tracking technologies.
- To send you updates on promotional/special offers, products, services, news and events from us or our associate(s)/partner(s) or third-part(ies) with which we may share your information from time to time.
- Communicate with you concerning our service so that MBHF can send you details about MBHF promotional announcements, marketing purposes and surveys, other services of MBHF affiliates.
- To improve our platforms and content thereon to provide better features and services.

- To conduct market research and surveys with the aim of improving our products and services.
- To prevent, detect, investigate, and take action against crimes (including but not limited to fraud and other financial crimes), any other illegal activities, suspected fraud or violations of our Terms of Use
- To the extent required for identity verification, compliance with subpoenas, court orders, requests/order from legal authorities or regulators or law enforcement agencies requiring such disclosure, regulatory requirements and due diligence checks.
- To establish, exercise, or defend legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings.
- To help advertisers understand our audiences and confirm the value of advertising on our platforms.
- To notify you about changes in terms of service or privacy policy
- To provide you with customer support

## 1.7 Third party Links & Content on Services

Please be aware that our Platforms may contain links to other sites that are not governed by this Privacy Policy. Users/Visitors may be directed to third-party sites for more information, such as advertisers, blogs, content sponsorships, vendor services, social networks, etc. We are not responsible for the content or the privacy practices used by other sites.

## 1.8 Security & Confidentiality

We make sure at all times to implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of your information as the same is of vital importance to us. At MBHF, we are strongly committed to protecting the personal and financial information that you submit to us. We seek to ensure to safeguard the security and confidentiality of any data you share with us in accordance with the laws relating to privacy as applicable in India. However, despite our utmost efforts to protect your Personal Data, we cannot warrant the security of any data you transmit to us through our online services/ platforms. By accepting this Privacy Policy, you accept that such transmission of your personal information is done at your own risk.

Lastly, you are requested to help us protect your data privacy by maintaining the secrecy of the username and password, if any, you use for any of our services.

## 1.9 Consent

Consent is often referred to as an individual's choice to "opt-in" or "opt-out" the use of their Personal Data and is usually obtained by a "check box" or signature confirming the individual understands and agrees to the processing of their Personal Data. At times, express written consent from you may be required based on the data processing activity. Whenever required, MBHF take consent from you prior to :

- Collecting, using, or processing your Personal Data, including sensitive Personal Data, in certain ways or sharing the your Personal Data with any third party (sensitive Personal Data is data revealing an your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation);
- Transferring your Personal Data outside of your country of residence.
- Using or placing web cookies on your computer or other electronic devices

## 1.10 Retention of Information

MBHF shall not retain or store such information for periods longer than is required for the purposes except when the information may lawfully be used or is otherwise required under any other law for the time being in force.

By agreeing to avail the services offered by MBHF, you have agreed to the collection and use of your Sensitive Personal Data or Information, as well, by MBHF. you always have the right to withdraw your consent to share/disseminate your Sensitive Personal Data or Information by contacting us on [privacy-shubham@shubham.co](mailto:privacy-shubham@shubham.co) However, in the event of your refusal or withdrawal of personal data, you shall fully not be able to avail any services of MBHF.

## 1.11 Information Sharing and Disclosure

We restrict access to your information to our employees who we believe reasonably need to know that information in order to fulfil their jobs to provide, operate, develop, or improve our products or services.

We have the right to transfer information about you in case MBHF is acquired or merged with another company. In this event, your information shall become subject to a different privacy policy which may be less than stringent than ours.

MBHF does not rent, sell, or share Personal Data about you with other people or non-affiliated companies except : a) to provide products or services you've requested, b) when MBHF have your permission, c) or under the following circumstances:

- MBHF provide the information to trusted partners who work on behalf of or with MBHF under confidentiality agreements. These companies may use your Personal Data to help MBHF communicate with you about offers from MBHF and our marketing partners. However, these companies do not have any independent right to share this data.
- MBHF may disclose your Personal Data to agents or contractors of MBHF and/or its group companies/affiliates to enable processing of transactions or communications with you on need basis. However it shall be on the basis that the agents are required to keep the information confidential and will not use the information for any other purpose other than to carry out the services they are performing for MBHF and/or its group companies/affiliates .
- RBI/NHB/ Registrar and transfer Agents/ KYC Registration Agencies (KRAs) and other such agencies, solely for the purpose of processing your transaction requests for serving you better.
- Any judicial or regulatory body, Auditors.

## 1.12 Changes to this Privacy Policy

We reserve the right to change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested to review the Privacy Policy periodically, to make sure that you are aware of any such changes.

## 1.13 How to Contact Us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site or have any complaints in the subject matter, please contact us at:

ManiBhavnam Home Finance India PVT LTD.

N-2 , 2'nd floor South Extension Part 1.

New Delhi- 110049

## **1.14 Disclaimer**

We do not store any bank account related information or any credit / debit card details. We shall not be liable for any loss or damage sustained by Users as a result of any disclosure (inadvertent or otherwise) of any information concerning the User's account, credit cards or debit cards in the course of any online transactions or payments made for any products and/or services offered through the Platform.

In case any Personal Information is shared by you with us, which is not requested by us, we will not be liable for any information security breach or disclosure in relation to such information.