

PRIVACY POLICY

1. PREAMBLE

Roha Hosuing Finance Private Limited maintains this site (www.rohahousing.com) ("Site") for your information and communication. Roha Housing Finance Private Limited ("RHFPL") respects the privacy of the customers and we at RHFPL are strongly committed to protecting it. This privacy policy is related to access or interaction of Users (each, a "user") on the website of RHFPL as well as any other media form, mobile website or mobile application related, linked or otherwise connected thereto and all product and services offered by RHFPL through any mode.

2. SCOPE AND ACCEPTANCE OF THIS PRIVACY POLICY

- a. This Policy applies to the personal data and the sensitive personal data that RHFPL collect about you for the purposes of providing you with our services. Personal data or information as used in this Policy shall include sensitive personal data or information, as applicable. This Policy is formulated under the Information Technology Act 2000, the IT (RSP) Rules (defined hereinafter) and the Guidelines on Digital Lending issued by the Reserve Bank of India dated 2 September 2022("DLG Guidelines").
- b. By using this website or by giving us your personal data and sensitive personal data, you accept the practices described in this Policy, its contents, and have provided your informed consent to RHFPL for collecting, storing, processing, transferring and sharing your Personal Information with lenders, partners, service providers for the purposes set out in this Policy. If you do not agree to this Privacy Policy, please do not use this website or give us any personal data or sensitive personal data.
- c. RHFPL reserve the right to change this Policy without prior notice. We encourage you to regularly review this policy to ensure that you are aware of any changes and how your personal data may be used.
- d. Please note that RHFPL also deals with activities apart from digital lending as covered under the DLG Guidelines. Please note that with respect to digital lending under the DLG Guidelines, the following shall be applicable to the Company and it shall ensure that lending service provider engaged by RHFPL do not store personal information of borrowers except some basic minimal data (viz., name, address, contact details of the customer, etc.) that may be required to carry out their operations. A one-time access can be taken for camera, microphone, location or any other facility necessary for the purpose of on-boarding/KYC requirements only, with the explicit consent of the borrower. Please note that separately, the aspects pertaining to DLG Guidelines as mentioned in this Policy shall only be applicable with respect to digital lending undertaking by RHFPL. With respect to the DLG Guidelines, respective parties shall comply with the extant RBI guidelines in this respect.

3. PERSONAL IDENTIFICATION INFORMATION

Users can visit RHFPL website as visitor without giving any personal information. In some cases, we may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our website, fill out a form, and in connection with other activities, services, features or resources we make available on our website. Users may be asked for, as appropriate, name, email address, phone number. RHFPL will collect personal identification information from Users only if they voluntarily submit such information on website or register with us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain website related activities.

4. COOKIES

Website of RHFPL may use "cookies" in area of our website that users have visited to enhance User experience. A Cookie is a small piece of data stored on your computer or mobile device by users web browser. We use Cookies to personalize the Content that you see on our Website. Most web browsers can be

set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our Website correctly or at all. We never place Personally Identifiable Information in Cookies.

5. INFORMATION WITH REGARD TO PERSONAL INFORMATION

RHFPL will use the information primarily for the following purposes:

- All information which collected by RHFPL shall be used for lawful purposes and to contact you via calls, mails and/or text messages on the contact details so provided, to furnish you with information with regards to the services and products of RHFPL.
- Information which provided by the Users helps RHFPL to improve the customer service, by responding to service requests of users and support their needs more efficiently;
- For payment processing purpose;
- RHFPL may use the email address to responds inquiries, questions, and/or other requests of users.
- RHFPL adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of personal information, username, password, transaction information and stored data of User(s) on website.
- Information provided by Users to RHFPL shall not be shared with any external organization unless the same is necessary to protect the interest of RHFPL. RHFPL may share generic information not linked to any personal identification information of Users with our business partner and trusted affiliates for the services provided to users.

6. SERVICE PROVIDERS

RHFPL employ third party companies and individuals to facilitate the RHFPL Website ("Service Providers"), to provide our Website on our behalf, to perform Website-related services or to assist us in analyzing how our Website is used. These third-parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

7. SECURITY

RHFPL is fully committed to protect the privacy of its customers and has taken all necessary and reasonable measures to protect the confidentiality of the customer information and its transmission through the world wide web. But one should remember that no method of transmission over the internet, or method of electronic storage is fully secured and reliable so we cannot guarantee its absolute security.

We encrypt certain sensitive information to ensure that your personal details are safe as it is transmitted to us. Provided however, that RHFPL shall not be responsible in safeguarding that nature of personal information of its customers which is freely available in the public domain or accessible under the Right to Information Act, 2005 or any other law for the time being in force.

8. YOUR CONSENT

By using our Services, you consent to this Privacy Policy. You hereby expressly and irrevocably authorise RHFPL / its partners / affiliates to collect, store, share, obtain and authenticate any aspect of your personal information / KYC either directly or through any of the authorised agencies and disclose such information to our agents / contractors / service providers and to also use such information in the manner that may be required by RHFPL / its partners / affiliates including for the purposes of grant of credit facility and for purposes of its business and for such time period as we may deem fit. In this regard, you expressly and irrevocably authorise RHFPL / its partners / affiliates to collect, use, verify and authenticate your personal identity information / KYC in any manner without any notice to you.

9. DATA PROTECTION OFFICER AND GRIEVANCE REDRESSAL OFFICER

If you have any complaint under the Information Technology Act 2000, the IT RSP Rules or any FinTech/digital lending related complaints/issues, the contact details of the Data Protection Officer and Grievance Redressal Officer are provided below.

The Data Protection and Grievance Redressal Officer of **RHFPL** should acknowledge the complaint within 24 (twenty-four) hours and dispose of such complaint within a period of 15 (fifteen) days from the date of its receipt.

Grievance Redressal Officer: Mr. Mrinal Agarwal

E-Mail ID: Mrinal.agarwal@rohahousing.com

Data Protection Officer: Rupesh Kumar

E-Mail ID: rupesh.kumar@rohahousing.com

10. APPLICABLE LAWS & DISPUTE RESOLUTION

Any controversy or claim arising out of or relating to this policy shall be decided by Arbitration in accordance with the Arbitration and Conciliation Act 1996 and the governing law shall be the laws of India. The Arbitral Tribunal shall consist of one arbitrator who shall be appointed in accordance with the Arbitration and Conciliation Act 1996. Any such controversy or claim shall be arbitrated on an individual basis and shall not be consolidated in any arbitration with any claim or controversy of any other party. Any other dispute or disagreement of a legal nature will also be decided in accordance with the laws of India, and the Courts at Delhi shall have exclusive jurisdiction in all such cases, subject to the foregoing.

11. CHANGES TO THIS PRIVACY POLICY

RHFPL has the sole discretion to update this privacy policy at any time. **RHFPL** will endeavour to notify its customer any major changes but the customer may wish to check it each time they visit the website and moreover RHFPL shall post notification on website and will be effective as of the day it posted.

Signatories Overleaf

Preeti Singh (Chief Compliance Officer)	
Varun Khunteta (Head- Finance & Treasury)	
Mrinal Agarwal (Head-IT & Operations)	
Sunil Kapoor (MD & CEO)	