

**RBSG CAPITAL PRIVATE LIMITED**

CIN: U65999MH2017PTC302565

Registered Office: 1002, Floor-10, Marathon Icon, Off, Ganpatrao Kadam Marg, Opp Peninsula  
Corporate Park, Lower Parel (W), Mumbai-400013

Email Id: rishabb@automony.in

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**‘PRIVACY POLICY’**

**of**

**RBSG CAPITAL  
PRIVATE LIMITED**

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**PRIVACY POLICY**

THIS PRIVACY POLICY (“Policy”) has been drafted in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

RBSG Capital Private Limited, a Company within the meaning of Companies Act, 1956, having registered office at 1002 Flr 10, Marathon Icon Off Ganpatrao Kadam, Marg Opp Peninsula Corporate Park Lower Parel W, Delisle Road, Mumbai, Mumbai, Maharashtra, India, 400013 (hereinafter shall be referred to as “Automony ” or "Company" or "us" or "we") is an NBFC registered with the Reserve Bank of India (“RBI”) and website at <https://automony.in/com> ("Website") (App and Website are hereinafter together referred to as the "Platform").

THIS POLICY DESCRIBES OUR POLICIES AND PROCEDURES FOR THE COLLECTION, USE, STORAGE, PROCESSING, DISCLOSURE AND PROTECTION OF ANY INFORMATION, INCLUDING, BUT NOT LIMITED TO, BUSINESS OR PERSONAL INFORMATION PROVIDED BY YOU AS A USER (“YOU/R” or “USER”) WHILE USING THE PLATFORM. USER SHALL MEAN ANY PERSON/ PERSONS, WHO VISITS, USES, DEALS WITH AND/ OR TRANSACTS THROUGH THE PLATFORM OR AVAILS OUR SERVICES AND INCLUDES A BROWSER.

THIS POLICY CONSTITUTES A LEGAL AGREEMENT BETWEEN YOU, AS THE USER OF THE PLATFORM, AND THE COMPANY, AS THE LICENSED USER OF THE PLATFORM. YOU MUST BE A NATURAL PERSON WHO IS AT LEAST 18 YEARS OF AGE.

BY VISITING/ ACCESSING THE PLATFORM, THROUGH THE WEBSITE OR THE APP AND VOLUNTARILY PROVIDING US WITH INFORMATION (PERSONAL AND/ OR NON- PERSONAL) FOR THE PRODUCTS OR OTHERWISE, YOU ARE CONSENTING TO OUR USE OF IT IN ACCORDANCE WITH THIS POLICY. THIS POLICY DOES NOT APPLY TO THIRD-PARTY WEBSITES / APPLICATIONS THAT ARE CONNECTED VIA LINKS TO THE PLATFORM. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS

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OF THIS POLICY, PLEASE DO NOT PROCEED FURTHER TO USE/ ACCESS THIS PLATFORM.

YOUR USE OF THE PLATFORM WILL BE GOVERNED BY THIS POLICY AS APPLICABLE TO THE PLATFORM TOGETHER WITH ALL POLICIES, NOTICES, GUIDELINES, DISCLAIMERS THAT ARE PUBLISHED AND SHARED WITH YOU FROM TIME TO TIME WHICH ARE INCORPORATED HEREIN BY WAY OF REFERENCE INCLUDING BUT NOT LIMITED TO OUR TERMS & CONDITIONS AND SUCH OTHER TERMS AS MAY BE APPLICABLE TO YOU IN YOUR CAPACITY AS A USER OF THE WEBSITE. THIS POLICY SHALL BE ENFORCEABLE AGAINST YOU IN THE SAME MANNER AS ANY OTHER WRITTEN AGREEMENT.

THIS POLICY IS A PART OF THE PLATFORM TERMS & CONDITIONS AND ALL CAPITALIZED TERMS UNDER THIS POLICY THAT HAVE NOT BEEN SPECIFICALLY DEFINED HEREIN SHALL HAVE THE MEANING AS ASCRIBED TO IT UNDER THE PLATFORM TERMS & CONDITIONS.

WE MAY UPDATE THIS POLICY FROM TIME TO TIME. YOU MUST PERIODICALLY REVIEW THE POLICY FOR THE LATEST INFORMATION ON OUR PRIVACY PRACTICES.

**1. COLLECTION OF INFORMATION**

During your use of the Platform, we will collect information and data including but not limited to your personal information and sensitive personal information / data (“SPD & I”) as defined under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011. You hereby provide us explicit consent to collect the following data from you as a data provider which also includes SPD & I:

1. Your name, address, date of birth, contact information, marital status, PAN number, name of the bank where you have your primary account, bank statements, income tax returns, pay slips etc.;
2. Details regarding your employment, including, years of experience, details of income, name of the current employer, details of the office address, details regarding the years/months completed with the current employer;
3. Credit-related information that is collected from other sources like the credit bureau;
4. Know Your Customer data such as Valid Address proof, PAN, photo etc. as per KYC Master Direction 2016.
5. Your unique identifiers such as username and password, preferences

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information and transaction history;

6. Any other information that VSL is required to collect as per its specific mandate from Reserve Bank of India or as a requirement under applicable law in India;
7. Information from you electronically - like the pages viewed, how you navigate through the Platform and interact with the Platform, etc.

As detailed above, we also collect your personal information, including financial information, from the registration or other completed forms / questionnaires that You provide to Us. We will also receive your personal information, including financial information, from documents that you may provide to Us and/or from documents like the credit report that You authorize Us to obtain on Your behalf from credit information companies.

The information We collect about You will depend on the products and services we offer, on an ongoing basis. The information collected from You will be used in order to effectively provide Services to You. If You do not allow Us to collect all the information, We may not be able to deliver all of these services effectively. You hereby provide us explicit consent to use the data specified above as per the terms of this Policy.

You further understand and consent to the fact that We may also supplement the information We collect from You with information We receive from other companies or third parties. For example, We may use marketing segments developed by Us or other companies to customize certain services or offer more products to you.

## 2. USE OF INFORMATION

Personal information of individual users will not be sold or otherwise transferred to unaffiliated third parties without your approval at the time of collection. You hereby provide explicit consent to Us for the use of Your information provided (including SPD & I) provided by You to Us (as specified above) and to share such information with third parties for the following purposes:

1. Monitor, improve and administer our Platform
2. Manage our risks including the risk of fraud that may be committed against us or our partners;
3. Analyze how the Platform is used, diagnose service or technical problems and maintain security;
4. Send communications notifications, information regarding the products or services requested by You or process queries and applications that you have made on the Platform, including marketing and promotion of our Services or our

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Platform by way of tele-messages or emails or calls;

5. Manage our relationship with you and provide You with or inform you about other products or services we think you might find of some use;
6. Conduct data analysis in order to improve the Services provided to the User;
7. Use the User information in order to comply with country laws and regulations;
8. To conduct KYC based on the information shared by the User for the provision of Services and availing the Product. This would include conducting analysis of your bank statements and eKYC. Company, may directly or through third parties, conduct the KYC on its customers. In the event the KYC as detailed under this clause is being conducted by its third-party service providers, the Company shall share Your relevant information with such third-party service providers for availing the said services;
9. Use the User information in other ways permitted by law.
10. Use the information obtained from Your Device to control risk, detect fraud, and provide better services to You.
11. We will use and retain Your information for such periods as necessary to comply with Our legal obligations, court order, by Government authorities, by law enforcement authorities, resolve disputes, enforce Our agreements, or by other legal processes or where it becomes necessary to do so to protect the rights or property of Company and/or its group companies/affiliates, etc.
12. We require access to your location, make and manage phone calls, media (KYC upload) and SMS (Except personal msg) for internal credit risk analysis and will be used for application processing.
  - 12.1 Location: Collect and monitor the location of your device in order to provide you loan, offers, anti-fraud and other features.
  - 12.2 Phone: Collect and monitor specific information about your device including your hardware model, operating system and version, unique device identifier, user profile information, installed apps, wi-fi information, mobile network information to uniquely identify the devices and ensure that unauthorized devices are not able to act on your behalf helping us to prevent frauds.
  - 12.3 Media & Files: To allow you to upload documents and pictures for KYC purpose.
  - 12.4 SMS: Collect and monitor only transactional SMS like parties, description and

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amount. Other SMS data is not accessed.

12.5 Phone Number: Your phone number is collected for registration and sign-in purpose.

### 3. DISCLOSURE OF INFORMATION

You hereby provide explicit consent to the disclosure of your information (including SPD & I) by Us to our Affiliates, employees and to third parties as per the terms of this Policy. You provide us explicit consent to share Your information with third parties only in such manner and for the purposes as described below:

1. We may disclose Your information to other financial service providers, banks or NBFCs and Our third-party partners and service providers for providing the Services and offering the Products as detailed under the Terms & Conditions;
2. We may share the details of the Product and Your information with our third-party partners and service providers in order to conduct data analysis for the purpose of improving the Services and analyzing Your use of the Platform, and to service you better;
3. We may also disclose Your information to our third-party service providers for fraud detection, risk assessment and/or for sending promotional tele-messages and email;
4. We contract with third-party advertising networks, publishers and other entities to advertise Our Products and Services on Platform which are not affiliated with us and we shall share the information provided by You and the same shall not be used for any purpose other than to assist Us in Our advertising efforts.
5. We may disclose Your information, without prior notice, if We are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply Our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of Us, Our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
6. We may share Your information with third parties under a confidentiality agreement for provision of Services which inter alia restricts such third parties from further disclosing the information unless such disclosure is for the purpose as detailed under that confidentiality agreement. However, We are not responsible for any breach of security or for any actions of any third parties that receive Your personal information.

The borrower is provided with an option to give or deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent

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already granted to collect personal data and if required, make the app delete/forget the data during on boarding.

We will use and retain Your information for such periods as necessary to comply with Our legal obligations, resolve disputes, and enforce Our agreements.

#### 4. STORAGE AND SECURITY OF INFORMATION

We store and process Your personal information, including the information received from Your Device on cloud service providers.

All information received by Us, either directly from You or through Your Device is protected and secured by Us. We adopt multiple safeguards to protect the security of the information and data provided by You like firewalls and data encryption using SSL, and information access authorization controls.

We value your trust in providing us your personal information & hence we use reasonable safeguards to preserve the integrity and security of Your information against loss, theft, unauthorized access, disclosure, reproduction, use or amendment. To achieve the same, We use reasonable security practices and procedures as mandated under applicable laws for the protection of Your information. Information You provide to Us may be stored on Our secure servers located within India.

However, you understand and accept that there's no guarantee that data transmission over the Internet will be completely secure and that any information that You transmit to Us is at Your own risk. While it is always our endeavor to take all reasonable steps to prevent disclosure of information, however, no method of transmission, whether in physical form or over the internet, or method of electronic storage is 100% secure and may be subjected to unintentional risks, due to reasons beyond our control.

By accepting this Privacy Policy, you accept that such transmission of your personal information is done at your own risk.

#### 5. PHISHING

"Phishing" usually occurs when users of a website are induced by an individual/entity into divulging sensitive personal data by using fraudulent websites and/ or e-mail addresses. In the event of You providing information to a website or responding to an e-mail which does not belong to Us or is not connected with Us in any manner, You will be a victim of Phishing. We do not send e-mails requesting a user for payment information, user name or passwords. However, We may verify the user name, password etc. provided by You from time to time.

#### 6. SEVERABILITY AND EXCLUSION

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We have taken every effort to ensure that this Policy adheres with the applicable laws. The invalidity or unenforceability of any part of this Policy shall not prejudice or affect the validity or enforceability of the remainder of this Policy. This Policy does not apply to any information other than the information collected by Us through the Platform. This Policy shall be inapplicable to any unsolicited information You provide Us through the Platform or through any other means. This includes, but is not limited to, information posted in any public areas of the Platform. All unsolicited information shall be deemed to be non-confidential and the Company shall be free to use and/ or disclose such unsolicited information without any limitations.

**7. GOVERNING LAW AND DISPUTE RESOLUTION**

This Policy shall be governed by and construed in accordance with the laws of the Republic of India. The courts at Ahmedabad, Gujarat, India shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.

**8. NO WAIVER**

The rights and remedies available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. It may be waived only in writing. Delay in exercising or non-exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.

**9. CONTACT US**

If You require any information or clarification regarding the use of Your personal information or this Privacy Policy, you can contact us at [rishabb@automony.in](mailto:rishabb@automony.in)

If You have grievance with respect to use of Your personal information, please contact us at [rishabb@automony.in](mailto:rishabb@automony.in)



Mr. Rishab Bafna  
Director  
DIN.: 06492455  
Place: Mumbai  
Date:08/01/2024



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