#### **Privacy Policy**

This Privacy Policy ("Privacy Policy") describes the practices and policies of slice small finance bank Itd ("SFB" or "Bank" or "We" or "Our" or "Us" as the context may require) in relation to collection, use, processing, storage, retrieving, disclosure, or transfer of your information, including personal information and sensitive personal data or information that Bank may receive through your physical branch visits or access, interaction or use of Our websites, namely <u>https://nesfb.com/</u>, <u>www.sliceit.com</u> or any other website authorized by the Bank and the associated Android App, iOS App, mobile sites or any other medium, including but not limited to the Bank call-centre facility (if any) through which We offer Our Services (as defined under the Mobile Banking Terms and Conditions) (*collectively, the "Portal*")

All terms and conditions regarding usage of the Portal and availing Our Services, as set out in the <u>Mobile Banking Terms and Conditions</u> are incorporated in this Privacy Policy by reference. Capitalised terms not defined in this Privacy Policy will have the meaning as set out in the Mobile Banking Terms and Conditions.

#### User acceptance

By accessing or using the Portal or by availing Our Services, you agree to the terms of this Privacy Policy. The collection, use, processing, storage, retrieving, disclosure, or transfer of your information, including personal information and sensitive personal data or information (collectively, "Information") will be in accordance with this Privacy Policy and as required or permitted under applicable laws, including but not limited to the Information Technology Act, 2000 and the rules framed thereunder, as may be amended from time to time, Digital Personal Data Protection Act, 2023 and the rules framed thereunder, as may be amended from time to time and any other laws related to data and privacy that may be framed from time to time ("Privacy Laws") and the regulations, directions, circulars, guidelines or other mandates issued by the Reserve Bank of India ("RBI") or the National Payments Corporation of India ("NPCI") or Unique Identification Authority of India ("UIDAI") and as applicable to the Services (collectively, "Applicable Laws"). Your acceptance of this Privacy Policy is generated and preserved as an '*electronic record*' under Privacy Laws and will be binding on you.

This Privacy Policy will also be applicable on any Information, provided by you and/or collected and retained by Bank that has the registered office at 1st & 3rd Floor, Fortune Central, Basisthapur Byelane 3, Beltola, Guwahati, Assam-781028.

Please read this Privacy Policy carefully to make sure you understand how any Information you provide to Us will be handled. If you use any of Our Services, you will be regarded as

the practices described in this Privacy Policy, please do not provide Us with your Information, or use, access or interact with the Portal and/or avail Our Services.

You hereby represent to Bank that:

- 1. The Information you provide to Bank from time to time, is and shall be authentic, correct, current and updated and you have all the rights, permissions and consents as may be required to provide such Information to Bank.
- 2. You providing the Information as well as Bank's consequent storage, collection, usage, transfer, access or processing of the same shall not be in violation of any agreement, laws, charter documents, judgments, orders and decrees.
- 3. If you disclose to Us any Information relating to other people, you represent that you have the authority to do so and to permit Us to use such Information in accordance with this Privacy Policy.
- 4. You must ensure that the Information you provide Us remains accurate and up-to-date at all times.
- 5. Your Information will be stored in electronic form however certain data can also be stored in physical form. We may enter into agreements with third parties to store or process your Information or data. These third parties may have their own security standards to safeguard your Information or data and We will, on reasonable basis, require such third parties to adopt reasonable security standards to safeguard your Information.

#### Information We collect

Bank uses the Information collected from you or about you to enable you to receive Services. You hereby provide your consent to collect the Information in accordance with and for the purposes set-out in this Privacy Policy. If you choose not to provide Us any of your Information, you may not be able to access the Portal or take benefit of some or all of Our Services. Bank may collect the following Information either on its own or through various third parties including but not limited to Central KYC Registry ("CKYCR"), UIDAI, Credit Information Companies ("CIC"), Account Aggregators, Digilocker etc., and you hereby explicitly consent to the following:

1. Identity Information: When you set up your account on Portal or submit any application at the branch for availing any Services or avail any Services, we may in part or full, collect your Information such as name, address, signatures, biometric data, date of birth, copies of identity cards (ID), communication details including email id and phone number, previous names, maiden names, marital status, nomination, beneficiary details, domicile, citizenship, nationality, residence, any legal or other identifiers like Permanent Account Number (PAN)/ Taxpayer Identification Number (TIN)/ Aadhaar/ any officially

or similar online fields and also demographic information that you provide and aggregated or de-identified data.

- 2. Financial Information: We may collect following financial information when you opt to avail Our Services or transact via Our Services:
  - Bank account details, investments history, credit/debit card details, prepaid payment instrument details, any other instrument/ modality/ function details, UPI handles, income details, history in relation to these.
  - Employment / occupational information
  - Residential status under banking, general and tax laws.
  - Spending/saving/investing/payments/receipts/borrowing history.
  - Information collected when you make or receive payments
  - Other information such as information relating to occupation such as employer's name and address, if self-employed, type of account, income proof, bank statements, salary slip, passbook, and signature details.
  - Data that is collected when you make any transactions. Data may include financial and non-financial information associated with the transaction such as amount sent or requested, amount paid for products or merchant information, including information about any funding instruments used to complete the transaction.
- 3. Device: We may collect Information related to the electronic device you use to access the Portal, such as your devices' internet protocol (IP) address, browser type, operating system, software, device type, device ID and other device identifiers to detect and prevent fraud, ensuring that only authorized users have access to your account. This Information also helps us tailor the Portal's functionality and optimize its performance by helping us identify technical issues, ensuring a smoother, personalized user experience.
- 4. Other personal Information: We may collect other personal Information like CCTV images and data at Our Bank branches, offices and ATMs (but only for security reasons and to help prevent fraud or crime), official conversations during meetings/calls/correspondences/ discussions with Bank employees or any person authorized by the Bank, records of correspondence and other communications with you, including email, telephone conversations, live chat, instant messages and social media communications containing information concerning your grievances, complaints and disputes and any other information, data or records which you may consent to be collected or used.
- 5. Usage of the Portal: We may collect Information that you may electronically submit when you post on message boards, or information contained in searches, reviews, ratings or comments that you submit or the details of your visits of the Portal or usage behaviour on the Portal. Such Information may be used by Us to administer the Portal and compute general statistics regarding the use of the Portal. We may also use this Information to share important or relevant updates and information through push

activation/facilitation of certain Services on your device. This helps us prevent fraud, to enable KYC verification, secure your transactions, and enable certain features like UPI registration and personalized credit. We do not collect, store, or use any personal messages. You may choose to disable this permission at any time through your device settings, but this may limit the functionality of some Services.

- 7. Camera: We may require access to your device's camera for a seamless experience, for clicking your selfie for KYC purposes, and/or for video KYC, or to upload photos for profile updation and/or as may be required for KYC purposes, or for uploading any other necessary documents on the Portal, including for KYC verification.
- 8. Location: We may collect and monitor your location to verify your address, offer you customized promotions, ensure and check serviceability of Services and to prevent any fraudulent activity. We collect the location data from you in the following ways: (i) when you add your pin code on the Portal; or (ii) When you provide your permanent and/or current and/or communication address or (iii) when you enable such access from your mobile device. You may have restricted access to the Portal or the Services, if you disable, withdraw or do not provide this access.
- 9. Contacts: We may access your contacts list for transaction facilitation and to enable you to invite contacts to join our Services or participate in referral or rewards programs, in accordance with applicable law. Transaction facilitation will help you easily send money, make payments, or transfer funds to individuals in your contacts via our Services. You can control or revoke access to your contacts at any time through your device settings.
- 10. Microphone: We shall also take one-time access of microphone of Your device to facilitate on-boarding on the Portal through/for Video KYC verification.
- 11. Storage: We may require permission so that your documents can be securely downloaded and saved on your phone, and so you can upload any required documents as part of using the Services. This helps in providing a smooth and seamless experience while using the Portal.
- 12. Feedback Data and Other Data: We may access and save Information in the following instances:
  - When you contact Us or We contact you, We may record Information provided by you during such communications or record calls for quality and training purposes;
  - When you participate in Our referral programs or use any discount codes offered on the Portal and input such data;
  - When you provide any feedback or comments to Us on the Portal or any other platform.
- 13. Third Party Information: We may also work closely with regulatory organizations/authorities like National Securities Depository Limited ("NSDL"), Central KYC Registry ("CKYCR"), Unique Identification Authority of India ("UIDAI"), Credit Information Companies ("CIC"), Account Aggregators, Digilocker etc., third party

and/or such other Information as provided in this Policy. We may also collect your Information via other sources, such as Information from Our payment service providers, public records, publicly available sources or authorised service providers.

14. Installed applications – We may periodically collect information of apps installed on your mobile device for the purpose of enabling financial services like credit facilities. We may collect this data to ensure the security of your account by detecting potentially risky apps that could compromise the security of your device or Our services. We do not access or store any personal information from these applications.

Process of collection of Information

Your Information may be collected or processed through any of the following:

- 1. When You submit Your Information to Us including when You ask for certain products or Services.
- 2. When You avail Our Services.
- 3. During the course of transactions.
- 4. When You apply for availing certain Services, make enquiries or engage with Us in this regard.
- 5. Information collected during credit assessment, risk assessment, fraud checks, fraud detections, processes undertaken for fraud prevention, detecting malpractices or discrepant documents or information, prevention of misuse, assessment of credit worthiness, evaluation of financial standing, due diligence, physical and other inspections, verifications, KYC/ Anti Money Laundering (AML) checks, monitoring, collections, recovery, customer service etc.
- 6. When You use Our Portal and/or visit Our branches or offices for availing Services.
- 7. When You email or call or respond to Our emails/phone calls or during meetings with Our staff or any service providers or authorized representatives.
- 8. When You or others give the Information verbally or in writing. This Information may be on application forms, in records of Your transactions or if You make a complaint.
- 9. From information publicly available about You. When You make Information about yourself publicly available on Your social media accounts or where you choose to make the Information available through Your social media account, and where it is appropriate to be used.
- 10. From any persons involved in any payment system or infrastructure or architecture of which the Bank is a part including but not limited to National Automated Clearing House (NACH), UPI, Electronic Clearing Service (ECS), ATM portability, Immediate Payment Service (IMPS), Real Time Gross Settlement (RTGS), National Electronic Fund Transfer (NEFT) etc., or from any persons (including TPAP) to whom the Bank acts as a service provider, distributor, agent, referral entity, sponsor bank, PSP bank, etc., where You are

#### Use of your Information

We may use your Information that We collect in accordance with this Privacy Policy and for the following purposes:

- 1. To enable you to access the Portal;
- 2. To avail the Services we offer to you, including any associated services;
- 3. To facilitate payments for the transactions you make using the Services, including appropriate authentication in relation to your transaction;
- 4. To create, maintain or update your account and verify your identity;
- 5. To validate, process and share your Information with regulated entities, financial institutions, or service providers engaged by Us to facilitate the Services;
- 6. To enhance your user experience in relation to the Portal or the Services, including customisation of the Portal or the Services;
- 7. To perform activities such as data analysis, audits, usage trends to determine the effectiveness of our campaigns and as input into improving products and services;
- 8. For credit analysis, risk analysis, obtaining any reports, credit scores, credit information, for assessing and evaluating financial standing, fraud check, fraud probability, reference checks, due diligence/KYC verification, etc. including from or through any credit information companies, Account Aggregators or service providers.
- 9. To identify and/or detect security breaches or attacks, errors, fraud, money laundering, abuse and other criminal activities, and investigating and taking appropriate remedial and preventive action;
- 10. To provide relevant promotional offers or rewards to you, based on your consumption patterns;
- 11. To enforce Our Mobile Banking Terms and Conditions or this Privacy Policy and resolve any disputes;
- 12. To provide functionality, analyse performance, fix errors, bugs, and improve the usability and effectiveness of the Portal;
- 13. To deliver any administrative notices, alerts, advice, notifications and communication relevant to your use of the facilities on the Portal or Our Services, through social media (including WhatsApp), SMS and other media;
- 14. To comply with Applicable Laws or requests received from regulators, government, law enforcement or judicial authorities under Applicable Laws; To disclose to business partners, service providers, Our and their employees, agents and representatives on a need-to-know basis to facilitate provision of Services;
- 15. To carry out Our obligations and enforcing rights arising from any contracts between Us;
- 16. To help improve quality and design of Our Portal, including to create new features, promotions, functionality and services;

#### Sharing of your information

We may share your information for the following purposes: -

- 1. With financial institutions, credit information companies, Account Aggregators, NPCI, RBI, UIDAI, CKYCR or other regulatory agencies, to facilitate provision of Services, or as required under Applicable Laws;
- 2. With vendors or service providers, business partners, to provide you with the Services, facilitate account creation, provide technical or customer support, send you communications via emails, messages or tele-calling to inform you about the Services, or products, offers or services that may be of interest to you, push notifications to your electronic device on Our behalf, and collect, process and settle payments. We may also use other third parties for activities such as conducting surveys for Us, and may share your information with such third parties. With a buyer or other successor in the event of a merger, restructuring, reorganization, dissolution or other sale or transfer of some or all the assets/portfolio, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which your Information may be amongst the assets transferred;
- 3. With law enforcement agencies, courts, regulators and/or other governmental organizations which have jurisdiction, to ensure compliance with orders or government directives;
- 4. To enforce or apply the Terms and Conditions, this Privacy Policy and/or any other agreements/terms and conditions, entered/executed with you; or
- 5. In any other circumstances where We have your consent for any other purpose disclosed by Us when you provide the Information.

#### Third party policies

We may work with different third parties in connection with the Portal or for providing the Services. Please be aware that any information provided to any third-party or when you click through or are routed to third-party links while using the Portal, Our Privacy Policy no longer will apply and you will be governed privacy policy/privacy practice of such third parties.

In general, the third-party service providers used by Us will only collect, use and disclose your information to the extent necessary to allow them to perform the services or activities they provide Us. In such cases, We share the Information securely and use commercially reasonable efforts to ensure that all recipients comply with confidentiality, fidelity and secrecy obligations and sign covenants in this regard. We will require such third party to provide same or equal protection to the Information as provided in this Privacy Policy.

We recommend that you read their privacy policies to understand the manner in which your Information will be handled by them. In particular, remember that certain third-party service providers may be located in or have facilities that are located in a different jurisdiction. So, if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which such service provider is or its facilities are located. Once you leave the Portal or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy and in such circumstances the privacy policy of such other website will apply. We will not be liable for any acts or omissions of the third-party service provider.

Our security practices and policies

To secure the Information, We implement reasonable security practices and procedures as mandated under the Privacy Laws/applicable laws. We have comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with respect to the Information being collected and the nature of Our business.

We protect all Information using encryption standards TLS 1.2 and above during transit and AES 256 during storage. Access to all such Information is strictly regulated and under continuous monitoring to prevent any unauthorised access and disclosures.

In case of a security breach, the Bank follows its Cyber Crisis Management Plan (CCMP) and reports the incident to CERT-In, RBI, and relevant regulators within the required time.

Period of storage of the Information:

We will keep the Information we collect on our systems or with third parties for as long as required for the purposes set out above or even beyond the expiry of transactional or account based relationship with you: (a) as required to comply with any legal and regulatory obligations to which we are subject, or (b) for establishment, exercise or defence of legal claims, or (c) as specified in this Privacy Policy, or (d) in accordance with your specific consents.

When bank finds that information collected or stored or transferred is no more in use and if there is no legal or regulatory obligation to retain such information, bank will determine appropriate means to dispose personally identifiable information in a secure manner.

Withdrawal of Consent, Deletion & Rectification

You can access and review the Information shared by you, after fulfilling the pending contractual obligations, by getting in touch with Us. You can also withdraw or revoke consent given to Us to process any Information given by you to Us, by writing to Us at

Please note that Bank may continue to retain certain information to comply with Applicable Laws. Withdrawal of consent may also impact, serviceability/availment of certain products or services being provided to you at the time.

#### Information of Children

You must be at least 18 years of age to access the Portal. However, if a user of less than 18 years but more than 10 years of age ("Minor"), accesses the Portal and uses any Services, same can be done only with the consent and approval of a lawful guardian, including but not limited to Parents of the user ("Legal Guardians").

Modifications and Updation.

We reserve the right to change, modify, insert, or delete any provision of this Privacy Policy, from time to times.

We encourage you to periodically review this Privacy Policy for the latest information on Our privacy practices. Your use of the Portal or availing the services after an updated Privacy Policy becomes effective will indicate your acceptance of the updated Privacy Policy.

#### Cookies

Cookies are text files containing small amounts of information, which your computer or mobile device downloads when you visit a website. When you return to websites – or visit other websites that use the same cookies – they recognise these cookies and therefore your browsing device. Cookies do lots of different jobs, like helping us understand how this website is being used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests.

When you visit the Portal, one or more cookies will be sent to the device being used by you to access the Portal. The cookies are either used to improve the quality of the Portal or for storing your preferences as a user, improving search results and tracking user trends. You have the option of disabling cookies via your browser preferences on your device. However, if you disable cookies on your browser, some parts of the Portal may not function effectively.

#### Contact Us

If you would like to ask about, make a request relating to, or complain about how We process your information, please contact or email Our Grievance Redressal Officer, at one of the addresses below. Our grievance officer will attempt to expeditiously redress your grievances.

Name – Aasnish Saxena

#### **Designation: Grievance Redressal Officer**

Email ID - <u>customergrievance@nesfb.com</u> and <u>customergrievance@sliceit.com</u>

Contact number- 080-69390473

Name - Swetha S

**Designation: Nodal Officer** 

Email ID - principal.nodalofficer@nesfb.com and nodalofficer@sliceit.com

#### Contact number- 080-48318328

slice small finance	Legal	Company	Connect with us
bank Itd	Privacy	Careers	O'
1st & 3rd Floor, Fortune Central, Basisthapur, Bye Iane 3, Beltola Guwahati, Assam 781028 CIN U72900AS2015PTC026165	Terms of	Help Center	
	service	Contact Us	
	Disclaimer	Report© slice small financeVulnerabilitybank ltd. All RightsPress256 Bit SSL Security	
	Safety Financing		
	partners		256 Bit SSL Security
Contact us	Customer Grievance Redressal Mechanism		E CONFLIANT
08048329999 help@slicebank.com			
	Banking terms		