



PRIVACY POLICY

This Privacy Policy of Akara Capital Advisors Private Limited (hereinafter referred to as “**StashFin**”, “**we**”, “**our**” or “**us**”), is a legally binding document between you and StashFin. The terms of this Privacy Policy will be effective upon your acceptance of the same. This Privacy Policy does not require any separate physical, electronic or digital signature.

When you use, download and access the StashFin application, you are consenting to the collection, transfer, storage, disclosure and other uses of your information and data as per the terms of this Privacy Policy.

This Privacy Policy specifies the terms related to the management and handling of personal information of users (hereinafter referred to as “the Users”) using the services of the StashFin platform accessible through a Mobile application or through our website.

This Privacy Policy explains why we require personal information and how we collect, use, disclose and secure your personal information and other data that we gather when you use our Services, interact with other Users and third party websites and services.

By accessing or using the website, www.stashfin.com (“**Website**”) or the StashFin mobile application (“**Mobile Application**”), you signify that you have read, understood and explicitly agreed to be bound by this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time without prior notice. Therefore, we encourage you to review this Policy each time you access our Services. We will have link to this Privacy Policy, promptly available, on the mobile application and StashFin website that can be accessed by Users.

We shall, at all times, comply with all applicable data privacy and laws relating to security of the customer’s personal information. We shall also comply with various technology standards/ requirements on cybersecurity stipulated by RBI and other agencies, or as may be specified from time to time, for undertaking digital lending. The following terms and definitions have been set out in this Privacy Policy:

- “StashFin”, “We”, “Us”, and “Our” means Akara Capital Advisors Pvt Ltd which owns and operates the Website, www.stashfin.com (“**Website and Mobile Application**”). We along with EQX Analytics Private Limited (“**EQX**”) are group companies. EQX is the owner of the trademark ‘Stashfin’ and has granted us an exclusive worldwide royalty free license to use its trademarks for conducting business in the name of ‘Stashfin’.
- “You” and “Your” means a user of the website and the products and services provided via the website and Mobile Application.
- “Services” includes lending and any other related services by us via our Website and Mobile Application. Collection of user Information:

To create an account on StashFin, you must furnish certain information and details as part of our customer identification process. Your agreement to our User Terms and Conditions and this Privacy Policy governs how we treat your information. During the use of our Services, Website and Mobile Application, we may collect information about you from you and from third parties. While some information has to be mandatorily provided, others are optional. Certain portions of the information provided will remain private and you explicitly consent that such information may be shared with associated third parties.

Information collected

All information you provide to us is voluntary. This information includes but is not limited to the following functionalities (**Facilities**):

Upon registration:

- Information about you when you register or when you use our Website and Mobile Application.
- During the journey: information is collected from you, in order to help StashFin with customer verification and diligence required for StashFin and partners etc.
- Credit related Information: it is collected by us from credit bureaus etc. and is thereafter shared with the relevant lending partners, as necessary.
- Personal and financial information: including your name, email address, contact number, gender, date of birth, address, occupation and PAN number, Driving License number, Aadhaar Card / details, bank statements, etc.
- Personal information such as a one-time access for camera, location, installed applications or any other facility necessary in the manner as detailed hereunder. .
- Your unique identifiers such as username and password, preferences information and transaction history.
- Installed Applications: We take such access in the manner and for the purpose mentioned herein below.
- Direct Information: provided by you, when you write directly to us (including by e-mail) or when you connect with us over telephone etc.
- Any other information that StashFin is required to collect as per specific mandate from any bank or NBFC, which is also allowed under applicable law.
- Electronic bank statements through a third party provider.



- Permissions given by you through android or iPhone operating system or other operating systems based on your informed consent inter alia for one-time access to camera, one-time read-only access to phone state, including the current cellular network information, one-time user SMS data access, access to installed applications and other permission as may be specifically sought and disclosed in this Policy for the purpose of onboarding / KYC only.
 - We may collect the installed application data in line with point 5 (Installed Application) below: for the purpose of on-boarding, the said information as mentioned below shall generally be collected:
1. Location: We take one-time access at the time of on-boarding and prior to each disbursement (as each disbursement is underwritten as a separate loan) and to conduct KYC checks, as applicable.

How we use this information: We will collect your device location for conducting fraud related checks and for facilitating lending services as well as providing any non-lending services only in accordance with applicable laws. We shall also collect your device location information for verifying your address, for the KYC and for on-boarding process.

2. SMS Information: Stashfin collects, stores and analyses the SMS information from your device on need basis. We take one-time access at the time of on-boarding and prior to each disbursement, of the SMS data for conducting checks for any delinquency, bouncing charges or EMI reminders to help us in rejecting the delinquent/potential fraud cases.

How we use this information: . We shall collect any SMS information for facilitating you any lending services and non-lending service including such purposes as may be required by the lending partners or as per applicable law.

3. Phone : One-time access at the time of on-boarding and prior to each disbursement, of Phone related permission is taken only to monitor device details essentially to conduct fraud checks i.e. multiple loan applications made from one device at the time of on-boarding and for no other purpose. It is clarified that contact list of the customer is not accessed.
4. Camera: Access to camera will be taken to capture image at the time of on- at the time of on-boarding and for the purpose of Re-KYC, in order to be able to complete KYC checks. We may also request camera access to scan and capture the required KYC documents as per the instructions of our KYC partners, in accordance with applicable laws.

Installed Application; Access to applications is taken only to ensure that the loan will not be utilised for betting purpose / customer is not involved in betting or frequent borrowing which could affect his creditworthiness, this will be done by detecting if customer has various betting / lending apps - he /she will be rejected. This data will collected on one-time access basis, at the time of on-boarding and prior to each disbursement

You explicitly consent that a one-time access at the time of on-boarding and prior to each disbursement can be taken by us of your camera, location or any other Facilities necessary as mentioned herein above for the purpose of on-boarding/ KYC requirements only, for KYC checks which are done by us and/or our partners. You have the option to revoke consent to access abovementioned mobile phone resources by placing a request on the application or by writing to us at grievance.officer@stashfin.com.

You permit us to access your details and share with Lenders which are present in the UIDAI system/platform while conducting our KYC checks

By registering with StashFin or beginning an application on the Website or Mobile Application for any product or service, you are consenting to be contacted by us through written notices, email messages, text messages, WhatsApp, Telegram or telephone, and, in connection with any such telephone calls, you consent to the use of pre-recorded/artificial voice messages and/or automatic dialing devices, at any telephone number associated with your StashFin account, including mobile telephone numbers we have for you in our records or from other public and non-public databases we may lawfully access. You understand that anyone with access to your telephone or email account may listen to or read the messages StashFin leaves or sends you, and you agree that StashFin will have no liability for anyone accessing such messages. You expressly authorize StashFin to monitor and record your calls with StashFin. You agree that StashFin may contact you using the information you provided with information and offers of services available through StashFin website and Mobile Application.

Use of the Mobile Platform or Website is available only to persons who can form legally binding contracts under applicable law.

The information we collect will be stored in India and will depend on the products and services we offer, on an ongoing basis. The information that we request from you is required to deliver all of these services effectively. We shall ensure that no biometric data is stored/ collected in our systems, unless allowed under extant statutory guidelines.



We shall require a one-time access for camera, location, installed applications or any other facility necessary for the purpose and in the manner as mentioned herein under the head “Information collected”. You understand that, by creating an account or by registering through Third party websites, StashFin and other parties will be able to identify you by your StashFin profile. However, StashFin will not be liable under any circumstance for the generation of your profile or the information you provide therein. StashFin will also not be liable for any information collected in the form of SMS, or any other sources that the users might upload, the data collection process may extract, the use and misuse thereof. We will ask for your bank account details only for understanding your economic profile. All the information that you shall provide us is voluntary, including sensitive personal information. You understand that StashFin may use certain information of yours, under the IT Rules for the purpose of providing you with the Services and for sharing the information with affiliates who are subject to this Privacy Policy, as explained below.

Third-party sharing of your information

We at StashFin believe in protecting your information to all extent and therefore do not disclose or share your information with any third party, until it is important for us in order to provide you with desired services. Such partners can be identified by accessing <https://www.stashfin.com/recovery-agency> and <https://www.stashfin.com/partners>. You further agree that such disclosure, sharing and transfer of your data or information shall not cause any wrongful loss to you or to any third party, or any wrongful gain to us or to any third party.

You hereby unconditionally agree and permit that except as otherwise provided under this Privacy Policy, StashFin will disclose your Personal Information to third parties only in the following limited circumstances:

- We may transfer, share, disclose or part with all or any of your Information to various third-party service providers / partners / banks and financial institutions for one or more of the purposes or as may be required by applicable law. In such case we will contractually oblige the receiving parties of the information to ensure the same level of data protection that is adhered to by StashFin under applicable law. We shall ensure that all data is stored only in servers located within India, while ensuring compliance with statutory obligations/ regulatory instructions.
- We are the LSP/authorized agent / distribution partner of various RE's. We may transfer, share, disclose or part with all or any of your Information to such third-parties.
- If you use the Service through the StashFin, StashFin may disclose your information to the associated third-party service providers to facilitate the Services offered herein.
- To trusted partners who work on behalf of or with us under confidentiality agreements. These entities may use your information for performing marketing services, delivering goods, administering promotions, analyzing data and usage of the Service through the StashFin application, processing credit/debit card payments, operating the Service or providing support and maintenance services for the same, or providing customer service.
- You agree that we use other third parties such as a credit/debit card processing company, payment gateway, pre-paid cards etc. to enable You to make payments for availing Services on application. When You sign up for these Services, you may have the ability to save Your card details for future reference and faster future payments. In such case, we may share Your relevant information as necessary for the third parties to provide such services, including your name, residence and email address. The processing of payments or authorization is solely in accordance with these third-party policies, terms and conditions and we are not in any manner responsible or liable to You or any third party for any delay or failure at their end in processing the payments.
- We may also share the information with the government authorities or courts, pursuant to applicable laws and directives, for any investigation for offences in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of various terms and conditions or our policies and for non-payment of your loan.
- We may also share your information by taking your consent to share such otherwise via Stashfin Application etc.

Protecting your information

We have administrative, technical and physical safeguards designed to protect the security, confidentiality and integrity of your personal information. We store only basic minimal data (viz., name, address, contact details of the customer, etc.) that may be required to carry out its operations. The data is stored on AWS cloud servers to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls, SSL data encryption and access authorization controls. In addition, your personal information resides on servers or in areas of facilities that only selected StashFin personnel and contractors have access to.

We have a data destruction protocol, standards for handling security breach. Such terms can be accessed as under the policy: <https://www.akaracap.com/wp-content/uploads/2024/06/Data-Retention-Policy-Akara-Capital.pdf>

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. We assume no liability for any disclosure of information due to errors in transmission, unauthorized third party access to our Website and Mobile Application and databases or other acts of third parties, or acts or omissions beyond our reasonable control and you shall not be entitled to hold StashFin responsible for any breach of security.



Your choices regarding your personal information

Personal information that is not collected on the Website or Mobile Application or in connection with the Service is not generally subject to this Privacy Policy. The Website and Mobile Application may contain links to other websites which may collect personal information. For example, StashFin may have relationships with various service providers whose services you might find useful and are available to you from the Website and Mobile Application, from websites that are linked to the Website and Mobile Application, or in connection with the Service. Those providers' may require you to provide personal information to use their services. Unless expressly provided to the contrary, the privacy policy applicable to that website, and not this Privacy Policy will govern the collection, use, disclosure and security of your personal information.

You can access all of your personal and personally identifiable information that we collect and maintain by logging in to your account and going to "My Profile". This section of the site is password-protected to better safeguard your information. To protect the confidentiality of such personal information, you should not divulge your password to anyone. You are responsible for all uses of the Website and Mobile Application by any person using your Login ID and password. As a registered user, you can update, physical address, phone numbers, education and employment information at any time on the website. If you need to change any other information in your profile, you can contact us through the 'Contact Us' section on our Website and Mobile Application.

You confirm and understand that we at our sole discretion may retain the Credit Line Application Form, the photographs, information, and documents submitted by you. This would include details regarding your age, occupation, income, name, address, contact details of the customer, etc.

You confirm and understand that as per the provisions of the RBI/DBR/2015-16/18 Master Direction DBR.AML.BC.No.81/14.01.001/2015-16 (https://www.rbi.org.in/Scripts/BS_ViewMasDirections.aspx?id=11566) and Prevention of Money-Laundering Act, 2002 and the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 (both available at (https://www.indiacode.nic.in/handle/123456789/2036?sam_handle=123456789/1362)) that we are mandated to maintain and preserve customer account information for at least 5 years.

You also confirm that we shall have all right to retain such documents for our internal records as per document retention policies adopted by us.

You have the option to give or deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the application delete/ forget the data subject to compliance with applicable law.

Use of information collected

The information will be used by us for the following:

- To provide products you have requested;
- To provide services you have requested;
- To provide information to our partners to assist in making, credit decisions about you;
- To help investigate violations of our terms of use or to defend against legal claims;
- To disclose the information under special circumstances such as compliance with the applicable local law, court summons, court orders, requests/order from legal authorities or law enforcement agencies requiring such disclosure.
- Search credit bureaus and fraud prevention agencies;
- To get in touch with you when necessary and contact you by email, SMS, letter, telephone or in any other way about our products and services;
- To identify, prevent, detect or tackle fraud, money laundering, terrorism and other crimes;
- To form a view of you as an individual and to identify, develop or improve products, that may be of interest to you;
- Provide information to independent external bodies such as governmental departments and agencies, universities and similar to carry out research;
- Perform other administrative and operational purposes including the testing of systems;
- Trace your whereabouts;
- Recover any payments you owe to us or our partners;
- Comply with our regulatory obligations;
- To show you advertisements;
- Contact you as a survey respondent;
- To maintain records under applicable law or a may apply to pursuant to agreements executed by us;
- Carry out, monitor and analyse our business, Carry out market research, business, and statistical analysis and also direct our efforts for product improvement;
- Carry out audits.



Storing Personal Information

For the provision of lending services, we shall only store basic personal information such as your name, address, contact information which are required to be stored for carrying out our non-lending services. We ensure that every data and/or any information that we collect from the customer is stored in our servers, located in India and the same is stored as per applicable laws. For other personal information collected as a part of outsourcing services being provided to the Lending Partners, We shall collect such information upon the instructions of such Lending Partners and thereafter transfer the same to the Lending Partners upon the completion of the preliminary on-boarding. We may also share your Personal Information with our Co-lending partners, in line with the applicable law.

Information from advertisements on other websites

We place and track advertisements on third-party websites. Like many advertisers, we advertise our products and services, and we contract with third parties to place advertisements, on websites not affiliated with us where we think the advertisements are likely to be most relevant. These advertisements may contain cookies or other mechanisms that allow tracking of your response to our ads. Along with our contracted third parties, we track and report performance of our advertising and marketing campaigns by using cookies, web beacons, and other similar technology, which may be used to collect and store information about user visits, page visits and duration, and the specific ad or link that the user clicked on to visit the site. No personally identifiable information is stored during this process.

Contacting StashFin

If you have questions or complaints regarding our Privacy Policy or if you believe that StashFin has not complied with this Privacy Policy with respect to your personal information, please contact us at legal.reply@stashfin.com or at legal.reply@stashfin.com or grievance.officer@stashfin.com or cofficer@akaracap.com. If you are reporting non-compliance with this Privacy Policy, in your e-mail or letter, please describe in as much detail as possible (but without disclosing any sensitive information about you or any third party the ways in which you believe that the Privacy Policy has not been complied with. We shall try our best to resolve your query or complaint within the stipulated period prescribed under law.