

# **Kay Kay Hire Purchase Private Limited**

## **Digital Lending, DLA, LSP & Outsourcing Disclosure Policy**

### **1. Core principles**

- The Company remains the **regulated lender** and is accountable for compliance and customer outcomes even where an activity is outsourced.
- An LSP or DLA will not be presented as the lender.
- Due diligence covers technical capability, data privacy, security, fairness, recovery conduct, financial soundness, reputation, conflicts and the ability to comply with law.
- Contracts define permitted activities, data, service levels, audit and inspection rights including regulatory access, incident reporting, customer redressal, business continuity, subcontracting restrictions and exit obligations.
- Conduct is monitored, with corrective action, suspension or termination where necessary. Material arrangements are reported to the Board.

### **2. Customer journey standards**

- The lender's legal name and the partner's role are disclosed **before the customer commits**.
- A KFS and executed documents are delivered through verified channels.
- **Disbursement and repayment flow directly between the borrower's account and the Company's permitted accounts**, without any pass-through or pool account of a third party, except a specific regulatory exception.
- **Any fee payable to an LSP is borne by the Company** and is not collected separately from the borrower.
- A Board-approved cooling-off / look-up right is disclosed in the KFS and agreement.
- All loans are reported to credit information companies irrespective of tenor or structure.
- The identity of an authorised recovery representative is communicated before recovery contact where required.

### **3. Public product / DLA / LSP register**

*Complete and maintain for every live product where a third party performs customer-facing regulated activity.*

| Product                          | DLA / URL                                       | Partner legal name                    | Permitted activities                                                                                | Customer / grievance route                                                     |
|----------------------------------|-------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Unsecured bullet personal loan   | loancentral.in                                  | Credit91 Technologies Private Limited | Application, KYC facilitation, technology, servicing or collection, only as specifically authorised | Kay Kay grievance channel, plus partner grievance details if a partner is used |
| Two-wheeler hire purchase / loan | Company website, and branch and dealer channels |                                       | Sourcing, application support and servicing only within written authority                           | Kay Kay customer support and Grievance Redressal Officer                       |

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## **4. Data and permissions**

- Collect only need-based data with prior, specific and auditable consent.
- **Do not access contact lists, call logs, telephony functions, SMS messages, media files or general file storage.**
- Use one-time camera, microphone or location access only where necessary for onboarding or KYC, and only with consent.
- Provide controls to grant, deny, revoke or restrict consent and to request deletion where lawful.
- Store lending data in India, and ensure vendor deletion or return on termination, subject to legal retention.

## **5. Default Loss Guarantee / first-loss arrangements**

Where the Company enters an arrangement falling within the RBI framework for default loss guarantee or a similar credit enhancement, it completes due diligence, Board-approved limits, contractual and accounting controls, and the website disclosures required by the then-applicable directions. **No guarantee is represented as eliminating the borrower's repayment obligation or the Company's credit risk.**

## **6. Activities that are not outsourced**

The credit sanction decision, the determination of compliance with KYC norms, internal audit, and management of the risk and compliance functions are not outsourced.

## **7. Grievances and required links**

The Company is responsible for the redressal of any complaint arising in relation to a partner acting on its behalf.

**RBI Complaint Management System:** [cms.rbi.org.in](https://cms.rbi.org.in) · **RBI Sachet Portal:** [sachet.rbi.org.in](https://sachet.rbi.org.in)