

Kay Kay Hire Purchase Private Limited

Privacy, Data Protection & Cookie Policy

1. Data we may collect

- **Identity and KYC data** — name, date of birth, photograph, identity-document details, tax identifiers, address and verification results.
- **Contact, demographic, occupation, employment, income, business and household information** relevant to the product.
- **Financial and transaction data** — bank-account details, statements, cash-flow information, repayment records, mandates and payment references.
- **Vehicle and asset data**, where a facility relates to a vehicle — registration particulars, invoice and dealer details, insurance particulars, and details of the Company's recorded interest.
- **Credit information** obtained from credit information companies and other legally permitted sources.
- **Application, device, security and technical data** — IP address, device identifiers, browser, login events, consent logs and fraud signals.
- **Communication and service records** — calls, messages, emails, complaints and documents submitted.

2. Purposes of processing

To verify identity and perform KYC/AML checks; to assess eligibility, creditworthiness, fraud risk and repayment capacity; to process, sanction, disburse, service, collect, close or transfer a loan; to record and protect the Company's interest in a financed asset; to operate payment, mandate, communication, support and grievance processes; to report to and obtain information from credit information companies and competent authorities; to comply with the Motor Vehicles Act, 1988 where applicable; to secure systems, investigate incidents and maintain audit records; to improve products through proportionate and lawful methods; and to communicate marketing where permitted and subject to opt-out.

3. Consent and customer control

Consent requests are clear, specific and tied to an identified purpose. Consent may be withdrawn through the available channel, subject to legal retention and to the effect of withdrawal on the service requested. You may be given choices to grant or deny particular data uses, restrict disclosure where feasible, revoke consent and request deletion where lawful. Auditable consent and notice records are maintained.

4. Application permissions

Where you use any digital application operating on the Company's licence, need-based data minimisation applies. **The Company and any partner will not access your contact list, call logs, telephony functions, SMS messages, media files or general file storage for lending purposes.** A one-time camera, microphone or location permission may be requested only where necessary for onboarding or KYC, only with explicit consent, and with a clear purpose notice. A permission will not be used merely because it is technically available.

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5. Sharing

- Data may be shared on a need-to-know basis with dealers, insurers and registering authorities in connection with a financed vehicle; technology, payment, KYC, communication, storage, collection, valuation and audit vendors; credit bureaus; professional advisers and auditors; assignees; and government or regulatory authorities.
- Every recipient is bound by written agreement imposing confidentiality, security, purpose limitation, audit rights and deletion or return obligations at least as strict as those in this Policy. **The Company remains accountable for regulated activities it outsources.**
- **The Company does not sell personal data** and does not share it for a third party's independent marketing purposes.

6. Data location

Data collected in the course of the lending business is stored on servers in India, in accordance with applicable RBI directions. Any processing outside India, where legally permitted, is structured so that required data is returned to and retained in India and applicable safeguards are met.

7. Retention and deletion

Data is retained only for the purpose, legal, regulatory, audit, dispute and security periods applicable to the relationship. When retention is no longer necessary, data is securely deleted, anonymised or made inaccessible. A deletion request may be declined or deferred where the Company must preserve records or defend a legal claim.

8. Security

The Company uses proportionate administrative, technical and physical safeguards — access control on a need-to-know basis, encryption in transit and at rest, secure storage of physical records including documents of title, logging and monitoring, vendor security assessment, vulnerability management, backup and documented incident response. Personnel with access to customer data are background-verified and bound to confidentiality.

No system is completely risk-free. Please protect your devices and credentials and report suspicious activity immediately. In the event of a personal data breach, the Company will notify affected individuals and the relevant authorities as prescribed by law.

9. Your rights

Subject to applicable law, you may seek access to a summary of your personal data; correction of inaccurate or incomplete data; erasure where permissible; withdrawal of consent; nomination of another individual to exercise your rights in the event of death or incapacity; and grievance redressal. Requests may require identity verification.

10. Cookies and analytics

The website may use **essential cookies** for security, session management and functionality, and optional **analytics** or **preference** technologies where permitted. You may control non-essential cookies through the consent tool or your browser; disabling essential cookies may affect

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functionality. Any third-party analytics or advertising tool in use must be listed in the cookie notice.

11. Automated processing

The Company may use rules or automated tools to assist verification, fraud detection and credit assessment. Material decisions remain subject to applicable governance and human review. You may raise a grievance about an outcome through the stated channels.

12. Children and legally incapable persons

Products are not offered to persons not legally competent to contract. Where the data of a guardian, nominee or dependent is required, it is processed only for a lawful and stated purpose. Personal data of a child is processed only with verifiable parental consent as required under the DPDP Act, 2023, without tracking or targeted advertising directed at children.

13. Updates and contact

The current Policy is posted on this website. Material changes will be communicated where required. Privacy questions or complaints may be sent to the grievance or data-protection contact on the Contact Us page.