PRIVACY POLICY

1.INTRODUCTION

The domain name **archbridgecapital.in** (hereinafter referred to as "Website") is owned by **Archbridge Capital Private Limited** (hereinafter referred to as "ACPL"), a company incorporated under the Companies Act, 2013 on 29th July 2024, with its registered office at **DCG-4, 1011-1018, DLF Corporate Greens, Sector 74A, Southern Peripheral Road, Narsinghpur, Gurgaon, Haryana, 122004**.

For this Privacy Policy, the term "You", "Data Principal" or "User" shall mean any natural person to whom the personal data relates and who is visiting this Website or availing services from ACPL, and the terms "We", "Us", and "Our" shall mean ACPL, which shall act as a "Data Fiduciary" within the meaning of the Digital Personal Data Protection Act, 2023.

This Privacy Policy has been formulated in accordance with, and shall be read in conjunction with: (i) the Digital Personal Data Protection Act, 2023 ("DPDP Act") and the Digital Personal Data Protection Rules, 2025 ("DPDP Rules"); (ii) the Information Technology Act, 2000 ("IT Act") and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules"); (iii) the Reserve Bank of India (Information Technology Governance, Risk, Controls and Assurance Practices) Directions, 2023; (iv) Reserve Bank of India (Non-Banking Financial Company – Know Your Customer) Directions, 2025;; (v) the Reserve Bank of India (Digital Lending) Directions, 2025; (vi) the Reserve Bank of India (Outsourcing of Information Technology Services) Directions, 2023; and (vii) such other directions, master directions, circulars, notifications and guidelines as may be issued by the Reserve Bank of India ("RBI") from time to time, as applicable to ACPL in its capacity as an RBI-registered Non-Banking Financial Company – Investment and Credit Company (NBFC-ICC).

By accessing this Website or by sharing your personal data with ACPL, you are signifying your free, specific, informed, unconditional and explicit consent to the collection, processing, storage, use and disclosure of your personal data by ACPL in accordance with this Privacy Policy and the DPDP Act. You acknowledge that you have read and understood thie Privacy Policy, which has been made available in English and shall be made available, on request, in any of the languages specified in the Eighth Schedule to the Constitution of India. You retain the right to withdraw your consent at any time by following the procedure described herein. If you do not agree with the terms of Privacy Policy, please do not access the Website or share your personal data with ACPL.

2.TYPE OF PERSONAL INFORMATION COLLECTED

The personal information we collect can be categorized as information you voluntarily provide and information we collect automatically.

a) **Information You Voluntarily Provide:** This refers to any information you knowingly and actively provide us when using our Website or applying for our products or services. This includes:

   i. **Identification Information:** Name, gender, residential / correspondence address, telephone / mobile number, date of birth, marital status, and email address.

ii. **Financial & Statutory Information:** Permanent Account Number (PAN), KYC Status, Signature, Photograph, income and financial information, credit history, and Bank account or other payment instrument details. Certain of the foregoing items (including financial information, bank account or other payment instrument details, and biometric information, where collected) constitute "sensitive personal data or information" under Rule 3 of the SPDI Rules and shall be processed by ACPL in accordance with the reasonable security practices and procedures prescribed thereunder.

iii. Any other detail which may be required by us to provide our services.

b) **Information We Collect Automatically:** This refers to any information automatically sent by your devices in the course of accessing our Website or services. The term 'device' refers to any internet-connected device such as a phone, tablet, or computer.

i. **Usage and Log Data:** When you visit our Website, our servers may automatically log the standard data provided by your web browser. This data may include your device's Internet Protocol (IP) address, browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, unique device identifiers, and other diagnostic data. When you access our services through a mobile device, this data may also include the type of mobile device you use, your mobile device's unique ID, your mobile operating system, and the type of mobile internet browser you use.

ii. **Transaction Information:** We may read, collect, and monitor only financial transactional SMS for notification of transactions and corresponding amounts for credit risk assessment. Other SMS data is not accessed.

iii. **Media Information:** We may facilitate users to capture or upload relevant documents as required during user account management or the application process.

iv. **Contact Information:** We may request to read the Name and Phone number information when you select a contact as a reference during the application journey. We do not upload your contact list to our servers.

v. **Location Data:** We may receive and process information about your location. With your consent, we may collect information about the specific location of your mobile device (for example, by using GPS or Bluetooth). We may also derive your approximate location from other information about you, including your IP address.

3.TRACKING & COOKIES DATA

We use cookies and similar tracking technologies to track activity on our Website and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our services.

Purpose of Collection and Usage of Information

We collect and use your information when we reasonably believe it will help administer our business or provide products and services to you. Such purposes include:

a) To provide and maintain the services offered by ACPL.
b) To process your financial and non-financial transaction requests.
c) To undertake research and analytics for improving our services and user experience.
d) To check and process your applications for any of our financial services.
e) To communicate with you regarding updates or changes to our services and terms.
f) To investigate and resolve any complaints, claims, or disputes.
g) To respond to your queries and feedback.
h) For verification of your identity (including video-based customer identification process, where applicable) and other parameters. This may include contacting you via automated IVR calls, manual calls, SMS, e-mail or personal visits by our authorised representatives. Such communications shall be made strictly in accordance with the Telecom Commercial Communications Customer Preference Regulations, 2018 ("TCCCPR") issued by the Telecom Regulatory Authority of India, and shall be limited to transactional and service-related communications arising out of your existing relationship with ACPL, which are permitted to be sent notwithstanding registration on the National Customer Preference Register (DND), as provided under the TCCCPR. ACPL shall not send promotional communications without your specific consent.
i) To fulfil the requirements of applicable laws, regulations, or court orders.

4.DISCLOSURE OF INFORMATION

Your information may be disclosed to the following entities under strict confidentiality:

a) The Reserve Bank of India (RBI), Credit Information Companies (CICs) such as TransUnion CIBIL, Experian, Equifax and CRIF High Mark in accordance with the Credit Information Companies (Regulation) Act, 2005, the Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI), the Central KYC Records Registry (CKYCR), KYC Registration Agencies (KRAs), the Financial Intelligence Unit – India (FIU-IND), enforcement bodies (wherever sought) income tax and other tax authorities, the Data Protection Board of India, and other regulatory or government agencies as required by law.
b) Another business entity to carry out any business activity, re-organization, amalgamation, or restructuring of business.
c) Our professional auditors and legal advisors.
d) **Third-Party Service Providers:** We may employ third-party companies and individuals (acting as "Data Processors" under the DPDP Act) to facilitate our services. All such engagements are governed by a valid written contract that imposes obligations of confidentiality, security, purpose limitation and audit rights, consistent with the requirements of Section 8(2) of the DPDP Act, the RBI (Outsourcing of Information Technology Services) Directions, 2023 and, where applicable, the RBI (Digital Lending) Directions, 2025. Notwithstanding any such engagement, ACPL remains responsible and accountable for compliance with applicable data protection laws in respect of any processing undertaken on its behalf.
    i. We may use third-party services like Google Analytics to monitor and analyse the use of our Website.
    ii. We may engage third-party advertising companies that may use non-personal information about user visits to provide advertisements. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

e) **Legal Requirements:** ACPL may disclose your Personal Data in the good faith belief that such action is necessary to:

i. To comply with a legal obligation.
ii. To protect and defend the rights or property of ACPL.
iii. To prevent or investigate possible wrongdoing in connection with our services.
iv. To protect the personal safety of users of our services or the public.
v. To protect against legal liability.

5.RETENTION AND DISPOSAL OF INFORMATION

ACPL shall retain your information only for as long as is necessary for the purposes for which it was collected or as required under any applicable law. Without limiting the foregoing, KYC records and records of transactions shall be retained for a minimum period of five (5) years from the date of cessation of the business relationship with the customer or the date of the transaction, as the case may be, in accordance with Section 12 of the Prevention of Money Laundering Act, 2002, the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 and the RBI Master Direction – Know Your Customer (KYC) Direction, 2016. Records relating to credit information shared with Credit Information Companies shall be retained as required under the Credit Information Companies (Regulation) Act, 2005. We maintain clear internal policy guidelines regarding data storage periods, data destruction protocols, and security breach handling. Upon expiry of the retention period, or upon withdrawal of consent (where retention is not otherwise required by law), we will dispose of records containing your information using reasonable security measures and shall erase such personal data in accordance with Section 8(7) of the DPDP Act.

By using our services, you consent to our collection and use of your information. You may withdraw your consent at any time, with the same ease with which it was given, by contacting us at **customercare@archbridgecapital.in**. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal, nor shall it affect any processing that is permitted under any other legal basis (including processing required for compliance with applicable law or for the performance of a contract). On receipt of a request for withdrawal of consent, ACPL and its Data Processors shall, within a reasonable time, cease processing your personal data unless such processing is required to be continued under any law for the time being in force. However, this may result in you being unable to avail our services.

6.SECURITY PRACTICES

ACPL uses commercially reasonable safeguards to preserve the integrity and security of your information. All information is stored within a controlled database on secured servers located in India. ACPL has implemented reasonable security practices and procedures commensurate with the nature of the information being processed, comparable with international standard IS/ISO/IEC 27001 on "Information Technology – Security Techniques – Information Security Management System – Requirements", as contemplated under Rule 8 of the SPDI Rules. These measures include, among others, encryption of data in transit and at rest (where appropriate), firewalls, secure access controls, multi-factor authentication for privileged users, periodic vulnerability assessment and penetration testing, regular back-ups, business continuity and disaster recovery arrangements, and incident response procedures, in line with the RBI (Information Technology Governance, Risk, Controls and Assurance Practices) Directions, 2023.

a) **Internal Access Control:** Access to personal data by our personnel is restricted on a "need-to-know" basis, relevant for their respective functions.

b) **User Verification:** We take reasonable steps (like OTP) to verify your identity before granting access to your account. You are responsible for maintaining the secrecy of your password. Despite our measures, no security system is impenetrable. You transmit information to us at your own risk.

7.TRANSFER OF DATA

Your personal data shall ordinarily be stored and processed on servers located in India in compliance with the data localisation requirements applicable to NBFCs under the RBI (Digital Lending) Directions, 2025 and other applicable RBI directions and circulars. Where any payment system data is processed outside India, the same shall be deleted from systems outside India and brought back to India within the timelines prescribed by RBI. Any transfer of personal data outside India shall be made only to countries or territories that have not been notified by the Central Government as countries to which personal data may not be transferred under Section 16 of the DPDP Act, and shall be subject to such conditions as may be prescribed thereunder. ACPL shall ensure that contractual arrangements with recipients of such data provide for a level of protection that is at least equivalent to that required under the DPDP Act. By providing your personal data to ACPL, you acknowledge and consent to such transfer, storage and processing, subject to the safeguards described above.

8.RIGHTS OF DATA PRINCIPALS

You may, upon written request to us at **customercare@archbridgecapital.in**, review the personal information provided by you for any correction or amendment. In addition to the foregoing, where you have provided consent for the processing of your personal data, you are entitled to exercise the following rights conferred upon you as a Data Principal under Chapter III of the DPDP Act, by submitting a request to the contact details set out in Section 11 below:

(a) Right to Access Information: The right to obtain a summary of the personal data being processed by ACPL, the identities of all Data Fiduciaries and Data Processors with whom the personal data has been shared (along with a description of the personal data shared), and any other related information.

(b) Right to Correction, Completion, Updating and Erasure: The right to seek correction of inaccurate or misleading personal data, completion of incomplete personal data, updating of personal data, and erasure of personal data which is no longer necessary for the purpose for which it was processed, save where retention is required for compliance with any law for the time being in force.

(c) Right of Grievance Redressal: The right to readily available means of grievance redressal in respect of any act or omission by ACPL regarding the performance of its obligations under the DPDP Act, as set out in Section 11 of this Privacy Policy.

(d) Right to Nominate: The right to nominate, in such manner as may be prescribed, any other individual who shall, in the event of your death or incapacity, exercise your rights as a Data Principal in accordance with the DPDP Act.

Requests for exercise of the above rights may be made by writing to **customer.care@archbridgecapital.in**. ACPL shall endeavour to respond to such requests within a reasonable time and, in any event, within such timelines as may be prescribed under the DPDP Rules. ACPL may require you to authenticate your identity before acting on any request, and may decline requests that are manifestly unfounded, repetitive or excessive, or where compliance with the request would conflict with applicable law.

In terms of Section 15 of the DPDP Act, you shall, while exercising your rights, also comply with the duties prescribed thereunder, including by not impersonating another person, not suppressing material information, not registering false or frivolous complaints, and furnishing only verifiably authentic information.

8A. PROCESSING OF PERSONAL DATA OF CHILDREN AND PERSONS WITH DISABILITY

The services offered by ACPL are intended only for persons who are of the age of majority under the laws of India and competent to contract under Section 11 of the Indian Contract Act, 1872. ACPL does not knowingly collect or process the personal data of any child (i.e., an individual who has not completed eighteen years of age) or of a person with disability who has a lawful guardian. Where, in any case, ACPL is required to process the personal data of a child or such person with disability, ACPL shall do so only after obtaining verifiable consent of the parent or the lawful guardian, as the case may be, in such manner as may be prescribed under the DPDP Rules. ACPL shall not undertake any processing of personal data of a child that is likely to cause any detrimental effect on the well-being of the child, and shall not undertake tracking or behavioural monitoring of children or targeted advertising directed at children. If you believe that ACPL has inadvertently collected personal data of a child without verifiable parental consent, please contact us at the email address set out in Section 11 below, and we shall take steps to delete such data.

8B. PERSONAL DATA BREACH NOTIFICATION

In the event of a personal data breach, ACPL shall, without undue delay, intimate each affected Data Principal and the Data Protection Board of India in the form, manner and within the timelines prescribed under Section 8(6) of the DPDP Act read with the DPDP Rules. ACPL shall also report cyber security incidents to the Indian Computer Emergency Response Team (CERT-In) in accordance with the directions issued under Section 70B of the IT Act, and to the Reserve Bank of India in accordance with applicable RBI directions on reporting of cyber security incidents and unusual cyber incidents within the prescribed timelines.

9.LINKS TO OTHER WEB SITES

This Privacy Policy does not extend to third-party sites linked from our Website. We are not responsible for the privacy practices of such websites.

10.CHANGES TO OUR PRIVACY POLICY

This policy may change from time to time. We will post any changes on this page, and they become effective on the day they are posted. You are advised to review this page periodically. In the event of any material change to this Privacy Policy that affects the manner in which your personal data is processed (including any change in the purposes of processing or the categories of recipients with whom personal data is shared), ACPL shall, to the extent feasible and as required under applicable law, notify you in advance through an appropriate communication channel (such as e-mail, SMS, or in-app notification) and, where required under the DPDP Act, seek fresh consent. Material amendments shall not be applied retrospectively to processing already concluded under the earlier version of this Privacy Policy.

11.GRIEVANCE REDRESSAL

For any discrepancies and grievances related to the processing of your personal data, including any request for exercise of rights under the DPDP Act, you may contact the Grievance Redressal Officer designated by ACPL in accordance with Rule 5(9) of the SPDI Rules and Section 8(10) of the DPDP Act:

Grievance Redressal Officer

Address: Archbridge Capital Private Limited, DCG-4, 1011-1018, DLF Corporate Greens, Sector 74A, Southern Peripheral Road, Narsinghpur, Gurgaon, Haryana, 122004

E-mail: customercare@archbridgecapital.in

The Grievance Redressal Officer shall acknowledge receipt of every complaint within 3 (three) working days and shall endeavour to redress the same within such timelines as may be prescribed under the DPDP Rules and, in any event, within thirty (30) calender days from the date of receipt of the complaint, in accordance with Rule 5(9) of the SPDI Rules.

If you are not satisfied with the response of the Grievance Officer, or if no response has been received within the aforesaid timeline, you may escalate the complaint to the Nodal Officer of ACPL appointed under the Reserve Bank – Integrated Ombudsman Scheme, 2021, at nodalofficer@archbridgecapital.in.

If you do not receive a response from the Nodal Officer within a reasonable time, or if you are dissatisfied with the resolution provided, you may further escalate the matter to the Principal Nodal Officer of ACPL at principalnodalofficer@archbridgecapital.in.

Thereafter, if the complaint is not resolved within a period of thirty (30) days from the date of its initial filing with ACPL, or if you remain dissatisfied with the resolution, you may file a complaint with the Reserve Bank of India through the Complaint Management System portal at https://cms.rbi.org.in, in accordance with the Reserve Bank – Integrated Ombudsman Scheme, 2021.

Without prejudice to the foregoing, in respect of any grievance relating to processing of your personal data, you also have the right to make a complaint to the Data Protection Board of India established under Section 18 of the DPDP Act, in such manner as may be prescribed under the DPDP Rules.