



CREDITACCESS GRAMEEN LIMITED

Client Data Privacy Policy

Version 1.3
Classification: Public use

Revision History

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1.0	Arun Kumar B	First Draft	25/01/2016
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1.2	Arun Kumar B	Inclusion of COO and CRO as signatory and updated change in company name	21/10/2019
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1.0	Arun Kumar B	CAO and MD & CEO	Board of Directors
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1.2	Arun Kumar B	CAO and MD & CEO	Board of Directors
1.3	Arun Kumar B	CAO and MD & CEO	Board of Directors
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1 Introduction

In the course of its business, CreditAccess Grameen Limited (CA Grameen) collects, stores and processes data of its clients. The data so collected and used, whether on a paper or in a computer or on any other material, must be dealt with properly and securely. The purpose of this policy is to put in place appropriate measures, which are consistently applied to safeguard the data. CA Grameen is committed to ensuring the privacy and security of the data. This Data Privacy Policy describes how data on Personal Information and Financial Information of its clients is shared with others (who fall within the definitions as indicated below in the "Definitions" section)

2 Definitions:

"Client" means a natural person who has made application to CA Grameen for, enrolled in or signed an application in respect of any financial product or service offered by CA Grameen.

"Financial Information" is any data collected from the client regarding the client's businesses, income, expenses, repayment history, or credit.

"Personal information" is any data collected from the client that is about her family, health, or living conditions, including but not limited to contact information and location information as relevant.

"Credit Bureau institutions" are those institutions that collect information on individuals, who have availed of services/products offered by from credit grantors and other sources for a variety of uses including providing information on individual borrowings, payment behaviour etc.

"Industry Associations" Microfinance network institutions such as AKMI (Association of Microfinance Instructors in Karnataka) – of which CA Grameen is a member institution.

"Group Lending" means practice of working with individuals in small groups and lending to individuals who share repayment responsibility with one another (JLG – Joint liability group) in case of any difficulty that may arise for repayment.

3 Sharing of client information

CA Grameen respects privacy of client data and will not share clients' personal information or financial information to any third parties, except in the circumstances mentioned below:

3.1 When required by Credit Bureau institutions

CA Grameen shares client data with Credit Bureaus with the explicit consent of the borrowers, who in turn provide information on the client's borrowings from other financial institutions, overdue etc. This will help the CA Grameen eliminate/reduce the risk of granting loans likely to default, support fraud prevention, and protect clients against over-indebtedness by

checking existing debt. All the data shared with the Credit Bureaus is transmitted electronically, using a secure system.

3.2 When clients default on their loan

The below mentioned fields shall be provided to Credit Bureaus in order to report the customer's default status on the respective loan(s):

- Client name
- Financial products used by client; and
- Client credit repayment history.

Institutions in the Microfinance Network may use this information based on the credit information report drawn from respective Credit Bureau to avoid granting credit to clients who have not paid other loans.

3.3 When required by applicable laws

CA Grameen also shares with concerned authorities when required as per Law.

3.4 Non-Credit Products

In some instances, CA Grameen offers several products for sale in partnership with other financial institutions. One example is Life Insurance product. When selling products provided by another financial institution(s), CA Grameen provides the secondary institution with only the information they require as per applicable regulation. The format for sharing this information is pre-decided & the mode of transmitting such information is secure.

3.5 Use of client photographs

CA Grameen requires that all clients and their spouses submit their photograph at the time of joining the group in compliance with CA Grameen's Know Your Customer(KYC) policy and during various other stages of lending activities. This is a security measure that helps staff identify clients. Occasionally, CA Grameen uses photos and other information about clients in marketing and other materials. CA Grameen shall obtain Client's prior written consent for using Client testimonials, photos and/or case studies in marketing or other public materials. CA Grameen will not permit the use of Client photos by any other institution without written consent from the Client where such requests are routed through CA Grameen.

3.6 Group Lending

In group loans, group members will have access to personal information about each other member of the group and the group as a whole, including loan size and account balances. Other individual client information such as clients' family details will not be shared with the group by CA Grameen.

4 Keeping Client Information Secure

4.1 Security Measures

CA Grameen maintains physical, electronic and procedural safeguards to protect its clients' Personal Information and Financial Information, including clients' photos. CA Grameen follows stringent procedures and has documented processes for ensuring data security and confidentiality. Our institutional data security safeguards cover the following measures:

- a. Security of electronic data;
- b. Security of data in hard copy/physical form;
- c. Security of electronic / manual back-up systems;
- d. Staff access to client information;
- e. Copying, storage, and sharing of client data within and outside the institution;
- f. Electronic data entry and capture, unauthorized changes to the data and its transmission; and
- g. Archiving, storage and protection of client information.

Staff have been adequately trained and re-trained on the above data security practices and procedures.

CA Grameen will review the effectiveness of this policy to ensure it is achieving its stated objectives by taking into account changes in the law or regulatory requirements and any organizational or information security changes.

5 Enforcement

Violation of these policies may subject employees, consultants or contractors to disciplinary procedures up to and including termination.