

ORGANISATION AREA	DOCUMENT TYPE	VERSION
MANAGEMENT INFORMATION SERVICES AND DATA MANAGEMENT	DATA PRIVACY POLICY	VERSION 1.0
Approved by the Board of Directors on 23 January 2024.		



## BAJAJ AUTO CREDIT LIMITED

Registered office: - Bajaj Auto Complex, Mumbai Pune Road, Akurdi, Pune- 411035

## **Who is covered by the Privacy Policy?**

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This policy is applicable to all the existing customers, prospect customers and persons (“**User**”) who visit the office/branch and/or any ‘*Digital Property*’ belonging to Bajaj Auto Credit Limited (BACL).

This reference made to the term Digital Property would mean and include website, mobile application and/or any other electronic application.

## **Types of information**

This policy is applicable to any information:

- a) in the nature of personal / sensitive personal information of the User provided to BACL,
- b) that may be collected by BACL server from User’s browser, mobile app or mobile device, including cookies;
- c) which may or may not be personally identifiable and/or traffic information; and
- d) which may be collected by BACL, its dealers, agents/agencies, including the server from the User’s browser mobile app or mobile device.

For brevity’s sake, the above types of information is collectively referred as “**Information**” in this Policy.

## **Purpose**

Information collected from User may be used by BACL for the following listed “**Purposes**”:

- a) to provide the User with the services incidental and/or ancillary to the business of BACL;
- b) to promote the products/services of BACL;
- c) for evaluation of the existing BACL products/services, and/or develop products/services;
- d) to render service to User and/or to enhance / improvise the Products/Services.
- e) to comply with Applicable Laws / regulations, including credit reporting;
- f) to the extent permitted by Applicable Law / regulations, share or process User’s information in connection with the products / services provided by BACL and/or any third party.

## **Salient Features:**

- a) BACL respects the privacy of User in accordance with prevailing Law/regulation that governs privacy and always strives to uphold the standards in protecting the same.
- b) The Information shall not be shared with any external organisation unless the same is necessary to enable BACL to provide services, meet legal and/or regulatory compliance requirement and/or to enable the completion of a transaction, rendition of services, pursuant to applicable norms/process or pursuant to the terms and conditions applicable to such information as agreed with BACL.
- c) BACL may use the Information to enhance the User’s experience and may make subsequent

offersto the User about its products/services.

### **Cookies**

Cookies are small data files that a website stores on your computer/electronic device. While cookies have unique identification nos., personal information (name, a/c no, contact nos. etc) SHALL NOT be stored on the cookies. BACL may:

- a) use persistent cookies which are permanently placed on User's computer to store non-personal (Browser, ISP, OS, Clickstream information etc) and profiling information (age, gender, income etc);
- b) use Information stored in the cookies to improve User experience by throwing up relevant content where possible;
- c) use the cookies to store User preferences to ease User's navigation on the website/electronic/mobile application.

### **Data Governance and trainings**

Securing User's Information is of paramount importance to BACL. Following are some of the initiatives by BACL to security privacy of the User's Information:

- a) BACL has reasonable management, technical and administrative measures in place to protect Information within BACL.
- b) The Information Security & Compliance team in BACL is led by Chief Information Security Officer (CISO).
- c) Dedicated Cyber Risk Unit shall be established to tackle cyber threats, if any.
- d) Sound technical controls around Information and underlying systems shall be in place.
- e) BACL shall adhere to multiple regulatory and statutory requirements like RBI's Master Direction for NBFC, Guidelines for VKYC, etc
- f) BACL shall conduct periodic internal and external audits of its systems.
- g) BACL shall abide to Information Security certifications like ISO27001: 2013 (ISMS), ISO22301 (BCMS)
- h) Updates on information security position shall be updated at regular intervals to Board members, senior management of BACL via IT strategy committee as well as Risk Management Committee.
- i) In all contractual arrangements, we require BACL employees, third party agencies/service providers to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information. Staff

shall also undergo mandatory information security awareness training annually once and at the time of joining.

- j) Any acts involving (i) unauthorized usage/ sharing of Information, (ii) breach of security procedures; (iii) usage of Information for unlawful gain (iv) breach of IT policy/procedure; and (v) breach of confidentiality as per employment terms and/or Code of Conduct, shall warrant appropriate disciplinary action as per Company's Policy.

### **Service Providers**

We may employ third-party service providers and individuals due to the following reasons (not exhaustive):

- To facilitate BACL's products/ services;
- To provide the service on behalf of BACL;
- To perform any ancillary service related to products/services of BACL;
- To assist BACL in analysing how the services are used; and
- To assist BACL in evaluating and improvising our service standards.

User is hereby informed that the third-party service provider/agent/agencies will have access to your Information on a need-to-know basis to assist BACL in rendering service and are restricted from using the same for any other reason. The third-party service provider is obligated not to disclose or use the Information for any other purpose.

### **Security**

We value User's trust in providing Information with BACL. Hence, BACL continuously strives to use commercially reasonable efforts in protecting such Information. However, no method of transmission, whether in physical form or over the internet, or method of electronic storage is 100% secure and may be subject to unintentional risks, due to reasons beyond the control of BACL.

### **Responsibility of User**

User acknowledges the following:

- a) BACL and/or its employees /assigns will not contact the User directly for disclosure of any sensitive and personal information unless required for the abovementioned purposes. Hence, User is solely responsible to exercise proper due diligence to verify the identity of the individual(s) contacting before disclosing any personal and sensitive personal data/ information by reaching out to the BACL's nearest branch or BACL's official customer care number accessible on its website before making any disclosure.
- b) BACL will not be liable / responsible for any breach of privacy owing to User's negligence.

- c) User shall only use the official website/links of BAFL for availing product/services by inputting the domain information on the address bar.
- d) User is completely aware about the potential risk of data/privacy breach and User shall be solely liable for any unauthorized disclosure/ breach personal/ sensitive personal information etc. and any direct/ indirect loss suffered by User due to User's conduct. Hence, User shall exercise utmost caution to ensure that User's personal data/ Sensitive personal data (including but not limited to any Passwords, financial information, account details, etc.) are not shared/stored/made accessible through: any physical means with or without User's knowledge (disclosure to any person/third-party etc.) or through any electronic means, by exercising the following precautions/ safety measures:
- (1) User shall always check if "https" appears in any website's address bar before making any online transaction, to ensure that the webpage is encrypted;
  - (2) User shall avoid using third- party extensions, plug-ins or add-ons on the/your web browser, as it may result in the risk of tracking or stealing of User's personal details;
  - (3) User shall always type the information and not use the auto-fill option on web-browser and mobile apps to prevent the risk of storage of my personal/ sensitive personal information;
  - (4) User shall NOT access darknet, unauthorized/ suspicious website, suspicious online platforms, downloading information from unreliable sources;
  - (5) User shall ensure to disable cookies before accessing any domain/website, to ensure that User's personal information is not tracked by any third-party, unless otherwise consciously permitted by User by accepting the same, for which, User alone will be responsible for the consequences thereof;
  - (6) User shall not respond to any generic emails from an unknown/ unidentified source;
  - (7) User shall check the Privacy Policy of website/ application to know the type of information that may be collected from User and the manner in which it may be processed by the website/ application before accepting/ proceeding/ transaction on any website/ application;
  - (8) User shall always verify and install authentic web/mobile applications from reliable source on User's computer/Laptop/tab/ipad/ smart phone or any other electronic device;
  - (9) User shall NOT access any unidentified weblinks, bitly link or any other electronic links shared over electronic platform (such as email, sms, social media, websites);

### **Retention of Information**

BAFL may retain User's Information if it is required to provide services or as long as it is required for business purpose. Retention of Information will be as per applicable law/regulatory requirements in India. Information may be retained for an extended period (i) in case of requirement of any investigations under law or as part of any requirement before Courts/Tribunals/Forums/Commissions etc and (ii) to enhance / improvise the products /services of BAFL.

### **Website & links to Other Sites**

BACL's website/ electronic/mobile application may contain links to other sites. If User clicks on a third-party link, User may be directed to that site. It may be noted that such external sites are not operated by BACL and is beyond the control of BACL. Therefore, BACL strongly advises the User to review the privacy terms/policy of such external websites/electronic applications. BACL has no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

### **Amendment of Privacy Policy**

BACL may amend/update the Privacy Policy from time to time as required under law. Thus, User is advised to review this page periodically for any changes, since any such changes will be effective immediately after they are updated/posted on this page.

**Contact us:** In case if you may want to share your concern, we welcome you to easily reach out to us through multiple contact options displayed on <https://www.bajajautocredit.com/contactus/contact>

**Effective Date:** This Policy shall be effective from the date of approval by the Board of Directors of the Company, i.e., 23 January 2024.

Place: Pune  
Date: 23 January 2024

RAJIV BAJAJ  
CHAIRMAN