

NAVI PRIVACY POLICY

PLEASE READ THIS POLICY CAREFULLY BEFORE USING THE APP

The Navi App is made available by Navi Technologies Limited (formerly known as Navi Technologies Private Limited) (“**our**”, “**us**”, “**we**”, “**Company**”), having its registered office at AMR Tech Park, Ground Floor, No. 23 & 24, Hosur Road, Bommanahalli, Bengaluru, Karnataka – 560 068, through which: (a) Navi Finserv Limited (formerly known as Navi Finserv Private Limited and Chaitanya Rural Intermediation Development Services Private Limited) (“**Lending Partner**”) and various partner banks and financial institutions, as identified hereinbelow (“**Co-Lending Partner**”); (b) Navi General Insurance Limited (“**Insurance Partner**”); and (c) Navi AMC Limited (formerly known as Essel Finance AMC Limited) (“**Navi AMC**”) and Navi Mutual Fund (“**Navi Mutual Fund**”) shall provide their respective services to you (“**Services**”). The Lending Partner, Insurance Partner, Navi AMC and Navi Mutual Fund shall collectively be referred to as (“**Affiliates**”).

In order to facilitate and provide you (and co-applicants, members, nominees, if any) with the Services through the Navi App, we (i.e., the Company), the Lending Partner, the Co-Lending Partner, the Insurance Partner, Navi AMC and Navi Mutual Fund (as applicable) need to collect various data and information from you with your prior and explicit consent. The manner in which this data and information is collected, retained, shared, stored, and processed by us (i.e., the Company), the Lending Partner, the Co-Lending Partner, the Insurance Partner, Navi AMC and Navi Mutual Fund (as applicable) is addressed in this Navi Privacy Policy (“**Policy**”). By setting up an account on this App, you agree to the processing, storage, usage and sharing of the data provided by you pursuant to this Policy.

We may revise this Policy as well as update the Services and the App from time to time, so please keep visiting this page regularly to take notice of any changes we make. If you do not agree with any part of this Policy, please stop using our Services immediately. Please also read our Terms of Use (“**Terms**”), which describe the terms under which we provide our and our Affiliates’ Services and the terms under which you can use our and our Affiliates’ Services.

We are a part of the Navi Group of companies. You can learn more further below in this Privacy Policy about the ways in which we share information across this group of companies and with our Co-Lending Partners. This Policy applies to all our Services unless specified otherwise.

This Policy, incorporates, and includes our Terms and the Agreement(s) executed by you (and co-applicants, members, nominees, if any) for availing our Services and our Affiliates’ Services. Words and phrases not defined in this Policy shall mean the same as provided in the Terms. All references to you (as a user / visitor) shall include references to all co-applicants, covered members or nominees, joint investors, if any.

SECTION 1: LENDING PARTNER AND CO-LENDING PARTNER SERVICES

If you avail services from the (i) Lending Partner; or (ii) the Lending Partner and the Co-Lending Partner, Section 1 of this Policy will be applicable to you.

1. WHAT DATA IS COLLECTED?

Summary: We, the Lending Partner and the Co-Lending Partner collect certain information provided by you, some of which is sensitive personal information. We have detailed what data and the manner in which this data is collected.

By using the App, you consent to providing us with your prior and explicit consent, our Lending Partner and our Co-Lending Partner, data in the ways listed below. We collect the data you provide to ensure that we can provide you Services in the best manner possible. Our Lending Partner and Co-Lending Partner uses this data to underwrite (i.e., assess the risk it will be taking) any loan it might offer you and to determine the rates for such loans. The data being asked from you helps us, our Lending Partner and Co-Lending Partner to provide services to you in a robust and user-friendly manner. We have detailed the manner in which we, our Lending Partner and our Co-Lending Partner collect data below:

S. No.	Means of Gathering Data	Data Collected
1	Data you input in the course of signing up and using our Services	<u>Navi Account Data</u>: We and our Lending Partner collect the data you provide to us when you create or update your Navi Account. This includes your name, phone number, email ID, PAN, date of birth, pin code, nature of employment, official employment email address and name of employer, monthly income, marital status and relationship with the co-applicant (in case the loan is being sought by more than a single applicant). We or our Lending Partner may require you to share further information on a later date to confirm the veracity of your information or pursuant to any additional features added to the App. <i>How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements.</i>

S.	Means of Gathering Data	Data Collected
		<u>Financial and KYC Information:</u> We, our Lending Partner and Co-Lending Partner collect the data you provide to us when you accept the tentative terms of the loans. This includes your photograph, Aadhaar Number, PAN, parents' names, bank account number, IFSC, proof of address (which can be your electricity bill, rental/lease agreement, gas bill, passport or driver's license, or any other document our App may be able to record). <i>How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication Partner and; For Legal Compliance and Requirements; For enabling and servicing of Co-Lending Products with our Co-Lending Partner.</i> <u>Other Data Solicited:</u> You may be required to provide further information to the Lending Partner or to the Co-Lending Partner for the purposes of processing your loan application. Such additional information may include (without limitation) bank statements, goods and services tax returns, salary and income statements and title documents for the property being financed. This data shall be supplied to the Lending Partner or to the Co-Lending Partner through us. You may also be required to provide this information to us, the Lending Partner and the Co-Lending Partner via physical documents, e-mail or other digital and offline methods. <i>How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For assessing the quantum and interest rate of loan to be extended; For Legal Compliance and Requirements; For enabling and servicing of Co-Lending Products with our Co-Lending Partner.</i> <u>Feedback Data and Other Data:</u> This includes the following: • If you call our call centers, we may record information provided by you to service you or record the calls for quality and training purposes. • Data you input when you participate in our referral programs or use any discount codes offered by us. • If you provide any feedback or comments to us on the App or as part of our research programs for improving the App. <i>How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Legal Compliance and Requirements.</i>

S.	No. Means of Gathering Data	Data Collected
2	Data we collect from your usage of our Services	<u>Geolocation data:</u> We and our Lending Partner collect the location data from you in two ways: (i) when you add the pin code as part of your Navi Account data; and (ii) from your mobile device when enabled by you to do so. We collect this data when our App is running in the background of your mobile device. You will not be able to use the App if you disable the location services. <i>How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements; For enabling and servicing of Co-Lending Products with our Co-Lending Partner.</i> <u>User Personal Information:</u> Our App collects user account data which includes email address, name to log in to the app. This information is required as part of the registration process to access our service and it is also used to auto populate relevant fields in the course of the interface of our app. Our App also collects mobile numbers for verification to check the active SIM status on the device, uniquely identify you and prevent fraud and unauthorized access. <u>Phone Book Contacts:</u> When you grant us access to the address book on your mobile device, then we and our Lending Partner access the names and contact information from your address book to facilitate invitations and to assess your phone usage and habits,. As part of the loan journey, we access your phonebook contacts which includes their contact names, phone numbers, account types, favorites (starred) and contact labels to enrich your financial profile. We use this data to determine your social network from your phonebook contacts and identify fraudulent contacts in your network and for promotional and marketing purposes. This helps us in detecting fraud loan applications and reducing credit risk. <i>How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; Marketing and Outreach.</i> <u>Financial SMS Data:</u> When you grant us access to the SMSs on your mobile device, then we, our Lending Partner and Co-Lending Partner collect SMS data stored on your mobile device. You will not be able to use the App if you disable this access.

S.	No. Means of Gathering Data	Data Collected
		How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For enabling and servicing of Co-Lending Products with our Co-Lending Partner. <u>App Data</u>: We and our Lending Partner collect the data about your installed applications, including the applications that you have installed on and from the date you create your Navi Account and the manner in which you use them. This also includes having access and permission to send you messages and notifications via your social media and instant messaging applications. You will not be able to use the App if you disable this access. How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach. <u>Usage data</u>: We collect data about how you interact with our Services. This includes data such as access dates and times, App features or pages viewed, App crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with our Services. How we use this data: See, For Enabling the App and its Services; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements. <u>Transaction information</u>: We, our Lending Partner and Co-Lending Partner collect transaction information related to the use of our Services, including the type of Services requested, date and time the Service was provided, loan availed, interest payable, EMI selected, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person and their usage of the App. How we use this data: See, For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For Enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements; For enabling and servicing of Co-Lending Products with our Co-Lending Partner.

S. No. Means of Gathering Data	Data Collected
	<u>Device data:</u> We collect data about the devices used to access our Services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data. <i>How we use this data:</i> See, <i>For Enabling the App and its Services; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach.</i> <u>Storage:</u> This permission is required so that users' documents can be securely downloaded and saved on users' phones and upload the right documents for a faster approval and disbursal of the loan. This helps provide a very smooth and seamless experience while using the app.
3 Information we receive from other sources	We may also be working closely with third parties (including, for example, credit information bureaus, business partners, partner banks and financial institutions, technical sub-contractors, analytics providers, search information providers, title deeds, property verification service providers and valuers) and may lawfully receive information about you and your co-applicant from such sources. Such data may be shared internally and combined with data collected on the App. We may also use the content you have shared publicly, including on third party platforms or applications, to promote our Services (including by quoting your content, reviews and/or recommendations, or displaying screenshots of your content, reviews and/or recommendations). <i>How we use this data:</i> See, <i>For Enabling the App and its Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements; For enabling and servicing of Co-Lending Products with our Co-Lending Partner.</i>

2. HOW AND WHY IS THE COLLECTED DATA USED?

Summary: The Company ,the Lending Partner and Co-Lending Partner collect and use data collected from you to ensure that the Services are as up to date as possible and provided in the most optimal manner to you.

The data that is collected in accordance with Section 1 of this Policy will be used in the manner detailed below:

S.		
No.	Reason of Use	Manner of Use
1	For Enabling the App and its Services	We use the data collected to personalize, maintain, and improve our Services. This includes using the data to: • Create and update the Navi Account. • Analyze your loan eligibility and estimate your loan terms. • Track the disbursement and repayment of the loan. • Enable features that allow you to add and remove bank accounts for your loan repayment and disbursements from time to time. • Enable features that help you check your loan history, credit scores (as provide on government databases), and other such App features as may be added from time to time. • Perform internal operations necessary to provide our Services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.
2	For Loan Processing and KYC Authentication	Our Lending Partner uses the data to analyze your creditworthiness, loan eligibility, KYC documents, current employment verification and, and the terms of your loans. While we collect the Financial and KYC Information, the Lending Partner is required to individually process the loan requests and verify the KYC documentation received. Failing to process such data means that you cannot be provided any loans. You hereby grant us explicit consent to fetch your KYC (Know Your Customer) details from the Central KYC Records Registry using the details provided by you. Our Lending Partner also uses the data to track disbursement and repayment of your loan.
3	For enabling and servicing of Co-Lending Products our Co-Lending Partner	Our Co-Lending Partner uses the data to analyze your creditworthiness, loan eligibility, KYC documents, current employment verification and, and the terms of your loans. You hereby grant the Co-Lending Partner explicit consent to fetch your KYC (Know Your Customer) details from the Central KYC Records Registry using the details provided by you. Our Co-Lending Partner also uses the data for underwriting, to track disbursement and repayment of your loan.
4	For Enabling Customer Support	We use the information to provide customer support, including to resolve your concerns from the use of the Services, and train our customer service executives.
5	For Research Development	We may use the data so collected for research, analysis, and product development to improve the UI/UX experience – all of which will ultimately improve how you experience the App. This also helps us develop automated actions to

S.	
No. Reason of Use	Manner of Use
	be triggered in certain events, such as when we need to identify if photographs uploaded are not clear, fraud takes place, IFSC is incorrect etc.
6 For Communications You and Us	Enabling We may add features that allow you to call us (through the App or otherwise), similarly, we may also need to contact you (through the App or any other channels that you give us access to, such as WhatsApp or Facebook).
7 For Marketing and Outreach	We may use the data we collect to market the App and our Services. This includes sharing your feedback, ratings and screen names for purely promotion and marketing purposes. Such promotion and marketing may be done, <i>inter alia</i> , via hoardings, banners, pamphlets, calls, SMSes, emails and other means.
8 For Automated Decisions	The App may provide automated features for customer responses, reimbursement tracking, etc. As our App grows, we will keep adding more automated features to the App.
9 For Legal Compliance and Requirements	We may use the data we collect to investigate or address claims or disputes relating to use of our Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.
10 For Product Innovation	We may use the data we collect to offer new products and services for your use.

3. HOW DO WE SHARE THE COLLECTED INFORMATION?

Summary: Please note that while none of your data is sold, it is shared with third parties on a contractual basis. This data is shared for processing of information and ensuring that you receive the Services.

We are very protective about your data. We may enter into data-sharing agreements or disclose the collected data in order to provide the Services and new product offerings to you. We have detailed the manner in which we and the Lending Partner share the collected data below:

S.	
No. Person Shared With	Purpose for Sharing
1 Sharing with third parties	<u>Service Providers</u>: We work with third party service providers to execute various functionalities of the App and we may share your information with such service providers to help us provide the App. Some of these functionalities may include: Analyzing transaction behavior and cashflows via your SMSs, bank statements, goods and services tax returns, salary and income statements, income tax returns, basis which your loan offer is generated.

- Validating and authenticating the official verification documents provided by you.
- Validating your preferred bank account, as well as transferring the loan amounts to you.
- E-signing of the loan agreement or sanction letter, populating the loan agreement or the sanction letter. The information shared with these service providers is retained for auditing of the agreements.
- eNACH set-up to enable autopay.
- Analyzing customer behaviour, conducting research into customer behaviour and contacting the customers for the said purpose, and to automate our marketing and outreach efforts.
- Detection and flagging of fraud.
- Cloud services.
- Gathering of additional information regarding your bank account and statement details, in case adequate information has not been provided by you or through the other service providers we work with.
- For manually collecting any sums owed by you to our Lending Partner.
- Validating and authenticating your employment status, employment information and employment duration.

Details of the third parties we share your personal information with are set out below:

Sl. No.	Vendor's - Entity Name	Address	Email ID
1	Slashrtc Software Services Private Limited	Office No. B1-006, Boomerang, B Wing, Chandivali Road, Powai Andheri East, Mumbai, India - 400702	info@slashrtc.com
2	Hyperverge, Inc.	104 1st Street, Los Altos, CA 94022	contact@hyperverge.co
3	Fintech Products And Solutions India Pvt Ltd	10-2-289/71, Krishna Doyen # 501, Shantinagar, Hyderabad - 500028, India	info@onemoney.in
4	TSS Consultancy Private Limited	602/603, Trade Link, E Wing, A Block, Kamala Mills Compound, Lower Parel, Mumbai - 400013	sales@tssconsultancy.com
5	Karza Technologies Private Limited	3rd Floor, Birla Centurion, Century Mill Compound, Lower Patel, Mumbai, Maharashtra, - 400013	connect@karza.in

6	Digitap.Ai Enterprise Solutions Private Limited	Novel MSR Park, 5th Floor, K. No. 731/2389, 93/9, Varthur Main Rd, Marathahalli, Bangalore - 560037	nageen.kommu@digitap.ai
7	Digitech Solutions Private Limited	Flat C-1603, Oak Block, Salarpuria Greenage Apts Bomanhalli, Hosur Main Road, Bangalore - 560068. Ka	support@digio.in
8	Razorpay Software Private Limited	1st Floor, SJR Cyber, 22 Laskar Hosur Road, Adugodi, Bengaluru, 560030, Karnataka, India	disclosures@razorpay.com
9	Razorpay Software Private Limited	2nd Floor, P&G Plaza, Cardinal Gracious Road, Chakala, Andheri (East) Mumbai, Maharashtra - 400099 India	privacy@payu.com
10	Juspay Technologies Pvt Ltd	5C, Zion Cottage, 16th Cross Street, Indra Nagar, Adayar, Chennai 600020 Current Address: 3rd Floor, Girija Building, #817, Ganapathi Temple Road, 8th Block, Koramangala, Bangalore - 560095	support@juspay.in
11	ICICI Bank Limited	Icici Bank Tower, Near Chakli Circle, Old Padra Road, Vadodara 390007, Gujarat, India.	Customer.care@icicibank.com
12	Yes Bank Limited	Yes Bank House, Off Western Express Highway, Santacruz (East), Mumbai - 400055	vestouch@yesbank.in
13	Gupshup Technology (India) Private Limited	Eastland Citadel, #150/1, Ground Floor, Hosur Main Road, Kaveri Layout, S.G. Palya, Koramangala, Bengaluru, Karnataka- 560029, India	enterprise-support@gupshup.io
14	Kaleyra, Inc.	The Pavilion, 1st Floor, #175 & 176, BG Road, JP Nagar 4th Phase, Bilekahalli, Bengaluru, KA - 560076	support@kaleyra.com

15	Karix Mobile Private Limited	A Wing, 3rd Floor, Prism Towers, Mind Space, Malad (W), Mumbai- 400064 India	marketing@karix.com
16	Moengage India Private Limited	1st Floor, #32, Salapuria Tower II, Chikku Lakshmaiah Layout, Luskar Hosur Road, Koramangala, Bangalore - 560029, India	hello@moengage.com
17	Bharti Airtel Limited	Airtel Centre, Plot No. 16, Udyog Vihar, Phase-Iv, Gurgaon, Haryana, 122015	Content.Grievance@airtel.com
18	Vodafone Idea Limited	Suman Towers, Plot No.18, Sector 11, Gandhinagar – 382011, Gujarat. T: +91-79 6671 4000, F: +91-79 2323 2251	support@vilpower.in
19	Exotel Techcom Pvt. Ltd	#22, Exotel Techcom, Near RMZ Millenia, Kensington Road, Ulsoor, Bengaluru, Karnataka, India – 560008	hello@exotel.in
20	Think Analytics India Private Limited	B 4072-73, Oberoi Garden Estate, Chandivali, Andheri(E), Mumbai - 400072.	info@algo360.com
21	Transunion CIBIL Limited	One World Centre, Tower 2A, 19th Floor, Senapati Bapat Marg, Elphinstone Road, Mumbai - 400013.	info@cibil.com
22	Crif High Mark Credit Information Services Pvt. Ltd	3B-01,02, 03, 3rd Floor Phoenix Paragon Plaza (Phoenix Market City Campus), CRIF High Mark Credit Information Service Pvt. Ltd. CTS No. 124/B, 15, L.B.S. Marg, Kurla (West), Mumbai- 400070. India	info@crifhighmark.com
23	Perfios Software Solutions Pvt. Ltd	No.66/5-25, 5th Floor, Indiquebe-Hm Vibha Building Lasker Hosur Road,	info@perfios.com

		Above Star Bazar, Adugodi, Bangalore - 560030 Ka. In	
24	Baldor Technologies Private Limited	4-F, Rushabh Chambers, Plot No. 609, Off Makwana Road, Marol Naka, Andheri - East Mumbai Mumbai City Mh - 400059 In	finance@idfy.com

Third Party Services: The App may allow you to connect with other websites, products, or services that we don't have control over (for example, if we allow you to pay through an external wallet facility then we will have to share your usage information with the facility provider). However, usage of such third-party services is subject to their privacy policies and not within our control. We recommend that you have a look at their privacy policies before agreeing to use their services.

LINK TO THIRD-PARTY SDK

Our application has a link to a registered third party SDK which collects data on our behalf and data is stored to a secured server to perform a credit risk assessment. We ensure that our third party service provider takes security measures in order to protect your personal information against loss, misuse or alteration of the data.

Our third-party service provider(s) employ separation of environments and segregation of duties and has strict role-based access control on a documented, authorized, need-to-use basis. The stored data is protected and stored by application-level encryption. They enforce key management services to limit access to data.

Furthermore, our registered third party service provider(s) provide hosting security – they use industry-leading anti-virus, anti-malware, intrusion prevention systems, intrusion detection systems, file integrity monitoring, and application control solutions.

Change in Control: While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets, we may have to disclose our databases and information we have stored in the course of our operations.

-
- | | |
|---------------------------------------|--|
| 2 Sharing with the Co-Lending Partner | We work with identified banks and financial institutions to provide co-lending products on the App, and we may share your information with such Co-Lending Partner(s). |
|---------------------------------------|--|

	The Navi App is a digital lending application facilitating the loan transactions between our customers, our Lending Partner and the Co-Lending Partner. Details of our Co-Lending Partners are captured on our website.
3 Sharing with law enforcement when needed	If any governmental authority or law enforcement officers request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process.

SECTION 2: NAVI MUTUAL FUND SERVICES

If you avail services from Navi AMC and Navi Mutual Fund, Section 2 of this Policy will be applicable to you.

1. WHAT DATA IS COLLECTED?

By using the App, you consent to providing us, Navi AMC and Navi Mutual Fund data in the ways listed in this Policy. We collect data from you for the purposes of complying with applicable law and to ensure that we can provide you Services in the best manner possible. Data collected may include name, title, company, address, phone number, email address, bank details, income details, debit card/ credit card information or net banking service information and other relevant data. We also collect other information such as the questions or comments submitted by you.

You can always refuse to supply personal information, however that may preclude you from taking certain actions and/or availing certain Services on the App. By visiting and/or using the App, you agree to this Policy. To aid us in protecting your privacy, you should maintain secrecy of your login ID and password, if any, provided to you in connection with your Navi Account.

2. HOW AND WHY IS THE COLLECTED DATA USED?

Summary: The Company, Navi AMC and Navi Mutual Fund collect and use data collected from you to ensure that the services are as up to date as possible and provided in the most optimal manner to you.

The data that is collected in accordance with Section 3 of this Policy will be used in the manner detailed below:

- For enabling the App and the Services.

- For processing your investment applications and KYC authentication.
- Redemption on the investments made by you.
- Enabling customer support.
- Research and development.
- Enabling communications between you and us and/or Navi AMC and/or Navi Mutual Fund.
- Marketing and outreach.
- Automated decisions, legal compliance, product innovation.
- Enabling you to download product information, order products and take advantage of certain other features of the App.
- Provide information or interactive services through the App.
- Seek your feedback or to contact you in relation to the Services.
- To administer or otherwise carry out our obligations in relation to any agreement you have with us.
- To create products or services that may meet your needs.
- To process and respond to requests, improve our operations, and communicate with visitors about our products, services and businesses.
- To allow you to subscribe to our newsletter.

3. HOW DO WE SHARE THE COLLECTED INFORMATION?

Summary: Please note that while none of your data is sold, it is shared with third parties on a contractual basis. This data is shared for processing of information and ensuring that you receive the Services.

We are very protective about your data. We may enter into data-sharing agreements or disclose the collected data in order to provide the Services and new product offerings to you. We have detailed the manner in which we and Navi AMC share the collected data below:

S.	
No.	Person Shared With
Purpose for Sharing	
1	Sharing with third parties <u>Service Providers:</u> We work with third party service providers to execute various functionalities of the App and we may share your information with such service providers to help us provide the App. Some of these functionalities may include: • Analyzing transaction behavior. • Validating and authenticating the official verification documents provided by you.

S. No. Person Shared With	Purpose for Sharing
	- Validating your preferred bank account, as well as transferring the loan amounts to you. - E-signing of necessary documents, populating information on the App or other investment and KYC related documents. The information shared with these service providers is retained for auditing of the agreements. - eNACH set-up to enable autopay. - Analyzing customer behaviour, conducting research into customer behaviour and contacting the customers for the said purpose, and to automate our marketing and outreach efforts. - Detection and flagging of fraud. - Cloud services. - Gathering of additional information regarding your bank account and statement details, in case adequate information has not been provided by you or through the other service providers we work with. - For manually collecting any sums owed by you to Navi AMC. - Validating and authenticating your employment status, employment information and employment duration. <u>Third Party Services:</u> The App may allow you to connect with other websites, products, or services that we don't have control over (for example, if we allow you to pay through an external wallet facility then we will have to share your usage information with the facility provider). However, usage of such third-party services is subject to their privacy policies and not within our control. We recommend that you have a look at their privacy policies before agreeing to use their services. <u>Change in Control:</u> While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets, we may have to disclose our databases and information we have stored in the course of our operations.
2 Sharing with law enforcement when needed	Notwithstanding any other provision of this Policy, we may share information if we have to in order to comply with the law. If any governmental authority or law enforcement officers request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process.

SECTION 3: INSURANCE PARTNER SERVICES

If you avail services from the Insurance Partner, Section 3 of this Policy will be applicable to you.

1. WHAT DATA IS COLLECTED?

Summary: We and the Insurance Partner collect certain information provided by you, some of which is sensitive personal information. We have detailed the manner in which this data is collected.

While using the App, you may be asked to share personal information as required. This may include, but may not be restricted to your name, mailing address, email address, phone number, debit card/credit card information or net banking service information, the insured individual's health related information and the personal information of the insured's beneficiary. This information is necessary to maintain our records about you to service you better at the time of issuing new policies and disbursing claims. We will collect personal identification information from you only if you voluntarily submit such information to us. You can always refuse to supply personal information, however that may preclude you from taking certain actions and/or availing certain Services on the App. Any information including your personal information provided by you on the App, will be deemed as an authorisation given by you to us and our Insurance Partner to use such information for the purpose as stated out on the App. By visiting and/or using the App, you agree to this Policy. To aid us in protecting your privacy, you should maintain secrecy of your login ID and password, if any, provided to you in connection with your account with the App.

S.	
No.	Means of Gathering Data
	Data Collected
1	Data you input in the course of signing up and using our Services <u>Navi Account Data:</u> We and our Insurance Partner collect the data you provide to us when you create or update your Navi Account or register for any event. This includes your name, phone number, email ID, date of birth, pin code, and relationship with the other covered members/nominees. We or our Insurance Partner may require you to share further information on a later date to confirm the veracity of your information or pursuant to any additional features added to the App. <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach; For Legal Compliance and Requirements.</i> <u>Financial and KYC Information:</u> We and our Insurance Partner collect the data you provide at the time of processing your claims. This includes your photograph, Aadhaar Number, PAN, bank account number, IFSC,

S.	Means of Gathering Data	Data Collected
		proof of address (which can be your electricity bill, rental/lease agreement, gas bill, passport or driver's license, or voter's identity card or any other document the App may be able to record). <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach; For Legal Compliance and Requirements.</i> <u>Other Data Solicited:</u> You may be required to provide further information to the Insurance Partner for the purposes of issuance of policies and processing of claims. Such additional information may include (without limitation) your health and lifestyle related data, bank statements, loan statement, salary and income statements. This data shall be supplied to the Insurance Partner through us. You may also be required to provide this information to us and the Insurance Partner via physical documents, e-mail or other digital and offline methods. <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach; For Legal Compliance and Requirements.</i> <u>Feedback Data and Other Data:</u> This includes the following: • If you call our call centers, we may record information provided by you to service you or record the calls for quality and training purposes. • Data you input when you participate in our referral programs or use any discount codes offered by us. This information collected includes the name and email address of the person you have referred and we will send the referred person a one-time email inviting them to visit the App. • If you provide any feedback or comments to us on the App or as part of our research programs for improving the App or through any survey conducted by Navi or any other mode of offline interactions.

S.	No. Means of Gathering Data	Data Collected
		<i>How we use this data: See, For Enabling the App and its Services; For Enabling Communications between you and us/Insurance Partner; For Issuing Insurance Policies; For Enabling Customer Support; For Research and Development; For Marketing and Outreach.</i>
	2 Data we collect from your usage of our Services	<u>Geolocation data:</u> We and our Insurance Partner collect the location data from you in two ways: (i) when you add the pin code as part of your Navi Account data; and (ii) from your mobile device when enabled by you to do so. We collect this data when the App is running in the background of your mobile device. <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach; For Legal Compliance and Requirements.</i> <u>User Personal Information:</u> The App collects user account data which includes email address, name to log in to the App. This information is required as part of the registration process to access our service and it is also used to auto populate relevant fields in the course of the interface of our app. The App also collects mobile numbers for verification to check the active SIM status on the device, uniquely identify you and prevent fraud and unauthorized access. <u>Payment and Billing Information:</u> We might collect your billing name, billing address and payment method when you buy an insurance policy from us. <u>Phone Book Contacts:</u> When you grant us access to the address book on your mobile device, then we and our Insurance Partner access and store the names and contact information from your address book to facilitate invitations, assess your phone usage and habits. As part of your usage of our Services, we collect all of your phonebook contacts which includes their contact names, phone numbers, account types, favourites (starred) and contact labels for promotional and marketing purposes. We also use this data to determine your social network from your phonebook contacts and identify fraudulent contacts in your network. This helps us in detecting fraud and reducing risk.

S.	Means of Gathering Data	Data Collected
		How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; Marketing and Outreach. <u>Financial SMS Data</u>: When you grant us access to the SMSs on your mobile device, then we and our Insurance Partner collect SMS data stored on your mobile device. You will not be able to access certain Services we provide on the App or we may require additional information and documents if you disable this access. How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies. <u>App Data</u>: We and our Insurance Partner collect the data about your installed applications, including the applications that you have installed on and from the date you create your Navi Account and the manner in which you use them. This also includes having access and permission to send you messages and notifications via your social media and instant messaging applications. How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach. <u>Usage data</u>: We collect data about how you interact with our Services. This includes data such as interaction patterns (such as screen actions, gestures: taps, scrolls) access dates and times, duration of time spent on the App, features or pages viewed, crashes and other system activity, type of browser, and third-party sites or services used before, after or in the course of interacting with our Services. We may also collect the type of mobile device you are using or the version of the operating system your computer or device in running on. How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach; For Legal Compliance and Requirements.

S. No. Means of Gathering Data	Data Collected
	<u>Demographic Information</u>: We may collect demographic information about you, events you like, events you intend to participate in, policies you buy, or any other information provided by you during the use of the App. This information may be collected as part of a survey also. <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach.</i> <u>Transaction information</u>: We collect transaction information related to the use of our Services, including the type of Services requested, date and time the Service was provided, insurance availed, premium payable and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person and their usage of the App. <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach; For Legal Compliance and Requirements.</i> <u>Device data</u>: We collect data about the devices used to access our Services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data. <i>How we use this data: See, for Enabling the App and its Services; For Issuing Insurance Policies; For Enabling Communications between you and us/Insurance Partner; For Marketing and Outreach.</i> <u>Storage</u>: This permission is required so that users' documents can be securely downloaded and saved on users' phones and upload the right documents for a faster approval of insurance policy and disbursement of claims. This helps provide a very smooth and seamless experience while using the App. <i>How we use this data: See, For Enabling the App and its Services; For Enabling Communications between you and us/Insurance Partner; For Issuing Insurance Policies; For Enabling Customer Support; For Research and Development; For Marketing and Outreach.</i>

S.	
No.	Means of Gathering Data
3	Information we receive from other sources We may also be working closely with third parties (including, for example, business partners, technical sub-contractors, analytics providers, search information providers, service providers, third-party administrators and medical examiners and may lawfully receive information about you and other covered members/nominees from such sources. Such data may be shared internally and combined with data collected on the App. We may also use the content you have shared publicly, including on third party platforms or applications, to promote our Services (including by quoting your content, reviews and/ or recommendations or by displaying screenshots of your content, reviews and/ or recommendations). We may also collect information you post in a public space on the App or on a third-party social media site belonging to us or our Insurance Partner. How we use this data: See, For Enabling the App and its Services; For Enabling Communications between you and us/Insurance Partner; For Issuing Insurance Policies; For Enabling Customer Support; For Research and Development; For Marketing and Outreach.

2. HOW AND WHY IS THE COLLECTED DATA USED?

Summary: The Company and The Insurance Partner collect and use data collected from you to ensure that the services are as up to date as possible and provided in the most optimal manner to you.

The data that is collected in accordance with Section 2 of this Policy will be used in the manner detailed below:

S.	
No.	Reason of Use
1	For enabling the App and its Services We use the data collected to personalize, maintain and improve our Services. This includes using the data to: • Create and update the Navi Account. • Analyze your eligibility for an insurance policy and estimate the terms of insurance. • Track premium payments.

S. No.	Reason of Use	Manner of Use
		• Enable features that allow you to add and remove bank accounts for payment of premium by you and claims disbursed, from time to time. • Enable features that help you check your insurance history and other features as may be added from time to time. • Perform internal operations necessary to provide our Services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends. • To improve our products and services. • To personalise your experience on the App. This could include displaying appropriate content based upon our judgment and discretion. • We may add features that allow you to call us (through the App or otherwise), similarly, we may also need to contact you (through the App or any other channels that you give us access to, such as WhatsApp or Facebook).
2	For Enabling Communications between you and us/Insurance Partner	We might use the information you provide: • To contact you for confirmation of a purchase on the App. • Respond to your pre-sale and post-sale service requests. • Support your needs efficiently and without delay. • To send you updates about services or products of relevance to you, or for other promotional purposes. • To respond to your requests or questions. We might use your information to confirm your registration for an event or contest. • We use information to send you transactional communications. We might send you emails or SMS about your account or a policy purchase. • The personal information, including sensitive personal information or data collected may be utilised by us towards sending/providing information on the products and services offered by us.
3	For Issuing Insurance Policies	Our Insurance Partner uses the data to analyze your eligibility for an insurance policy and the terms of the policy. Failing to process such data could mean that we may not be able to provide you with an insurance policy. Our Insurance Partner also uses the data to track payment of premium amounts and claim disbursements to you.
4	For Enabling Customer Support	We use the information to provide customer support, including to resolve your concerns from the use of the Services, and train our customer service executives.

S. No.	Reason of Use	Manner of Use
5	For Research and Development	We may use the data so collected for research, analysis, and product development to improve the UI/UX experience – all of which will ultimately improve how you experience the App.
6	For Marketing and Outreach	We may use the data we collect to market the App and our Services. This includes sharing your feedback, ratings and screen names for purely promotion and marketing purposes. Such promotion and marketing may be done, <i>inter alia</i> , via hoardings, banners, pamphlets, calls, SMSes, emails and other means. Further, we might send you information about special promotions or offers. We might also tell you about features or products. These might be our own offers or products, or third-party offers or products we think you might find interesting. Or, for example, if you buy an insurance policy from us, we'll enroll you in our newsletter.
7	For Legal Compliance and Requirements	We may use the data we collect to investigate or address claims or disputes relating to use of our Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.
8	For Product Innovation	- We may use the data we collect to offer new products and services for your use. - We use information to look at site trends and customer interests. We may use your information to make the App and our products better. We may combine information we get from you with information about you we get from third parties.

3. HOW DO WE SHARE THE COLLECTED INFORMATION?

Summary: Please note that while none of your data is sold, it is shared with third parties on a contractual basis. This data is shared for processing of information and ensuring that you receive the Services.

We are very protective about your data. We may enter into data-sharing agreements or disclose the collected data in order to provide the Services and new product offerings to you. We have detailed the manner in which we and the Insurance Partner share the collected data below:

S. No.	Person Shared With	Purpose for Sharing
1	Sharing with third parties	<u>Service Providers</u> : We will share information with third parties who perform services on our behalf, including for conducting research into customer behaviour and contacting the customers for the said purpose. We reserve the right to exchange,

S.	No. Person Shared With	Purpose for Sharing
		share or provide the information with vendors who, including but not limited to, help us manage our online registration process or payment processors or transactional message processors for that limited purpose. <u>Third Party Services:</u> The App may allow you to connect with other websites, products, or services that we don't have control over (for example, if we allow you to pay through an external wallet facility then we will have to share your usage information with the facility provider or if you are required to undertake medical exams, tests, etc. through a third-party). However, usage of such third-party services is subject to their privacy policies and not within our control. We recommend that you have a look at their privacy policies before agreeing to use their services. This policy does not apply to the content or the privacy practices neither does it cover the information and disclosure practices of those apps/service providers. We are not responsible for these third-party sites/services. <u>Change in Control:</u> While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets, we may have to disclose our databases and information we have stored in the course of our operations.
2	Sharing with law enforcement needed	Notwithstanding any other provision of this Policy, we may share information if we think we have to in order to comply with the law. If any governmental authority or law enforcement officers request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process.

SECTION 4: HOW WE WORK WITH OUR GROUP COMPANIES

If you avail any services from us, our Affiliates or our Co-Lending Partner, Section 4 of this Policy will be applicable to you.

As part of our Policy, we (i.e., the Company) and the Affiliates receive information from, and share information with each other. We may use the data we have collected for:

1. product research and development, marketing outreach and advertising relevant products to you;
2. tailoring product offerings for your benefit;
3. improving infrastructure and delivery systems of our services;
4. understanding and driving analytics on how our services are used;
5. promoting safety, security and integrity of our services, e.g., securing systems and fighting spam, threats, abuse, or infringement activities; and

6. improving our services, our Affiliates' services and your experiences using them, such as making suggestions for you, personalizing features and content, helping you complete purchases and transactions, and showing relevant offers and ads across the App.

SECTION 5: GENERAL

If you avail any services from us or our Affiliates, Section 5 of this Policy will be applicable to you.

1. CONTACT INFORMATION

Summary: You may reach out to the data grievance officer, Ms. Sugandha Sharma confidentially to enquire about the treatment of your data.

Our data grievance officer is: Ms. Sugandha Sharma. You may contact us on any aspect of this policy or for any discrepancies/grievances with respect to your personal data, by writing to our data grievance officer at Navi Technologies as follows:

1. help@navi.com for grievances relating to both the Lending Partner's and Co-Lending Partner's services;
2. gro@navi.com for grievances relating to our Insurance Partner's services;
3. mf@navi.com for grievances relating to the services provided by Navi AMC and Navi Mutual Fund.

2. WHAT ARE YOUR RIGHTS REGARDING THE DATA?

Summary: We have identified your rights in the table above and the manner in which you may exercise these rights.

It is important for us that you remain in control of your data. Please write to us at help@navi.com if you wish to exercise any of your rights under the Policy. You shall have the following rights:

S. No.	Your Rights	Details
1	Right to rectification	In the event that any personal data provided by you is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data. It may take up to 10 days to

S.	Your Rights	Details
		process your request. We urge you to ensure that you always provide us with accurate and correct information/data to ensure your use of our Services is uninterrupted.
2	Right to withdraw consent	You have the right to withdraw your consent to this Policy by uninstalling the App. However, if you have availed any services from our Affiliates, we shall have the right to continue processing your information while you are availing such services. However, we shall not retain your data and information if it is no longer required by us and there is no legal requirement to retain the same. Do note that multiple legal bases may exist in parallel, and we may still have to retain certain data and information at any time.
3	Right to opt-out	You can opt out of receiving push notifications through your device settings. You can opt-out of sending promotional and marketing communication to your phone book contacts by writing to us at help@navi.com . Please note that opting out of receiving push notifications may impact your use of the App.

3. WHAT IS OUR DATA SECURITY PRACTICE?

Summary: We aspire to keep your data and information as secure as possible and to that effect we have used state of the art software.

We use requisite technical and organizational security measures to ensure a level of protection for personal data appropriate to the nature, scope and purpose of processing personal data, the risks associated with such processing, and the likelihood and severity of the harm that may result from such processing. The transfer of personal data between your end device and us is carried out via best-in-class encryption protocols. If you communicate with us by e-mail, access by third parties cannot be ruled out. In the case of confidential information, we recommend using the mail, i.e., post or encrypted e-mail communication (PGP).

4. CONSENT MECHANISM

Summary: By applying for a loan, you have consented to all our data privacy practices. You can write to help@navi.com if you wish to revoke any consent.

By setting up a Navi Account, you agree to our and the Lending Partner's processing, storage, usage, and sharing of the data provided by you pursuant to this Policy. If you do not agree with any of the terms of this Policy or the Terms or wish to revoke any consent you have provided to us and/or the Lending Partner, please write to us at help@navi.com. However, please note that if you revoke any mandatory permissions or revoke the consent to process and store information such as your Navi Account data, Financial and KYC Information and/or any other information needed to facilitate your loan amounts, then we may have to cease the provision of Services to you. You cannot withdraw your consent once you have availed services using the App till you have closed all services with us and our Affiliates.

5. DATA RETENTION

Summary: We retain your personal data to the extent we need to. Once the legal basis for the retention expires, we will not hold onto it.

We shall retain the information you provide to facilitate your smooth and uninterrupted use of the App, and (i) to provide, improve and personalize our Services; (ii) to contact you about your account and give customer service; (iii) to personalize our advertising and marketing communications; and (iv) to prevent, detect, mitigate, and investigate fraudulent or illegal activities. We do not retain your personal data for longer than required for the purpose for which the information may be lawfully used. For any other information, we may entertain your request for deletion, however, you may not be able to use our Services at all after such deletion.

6. CHILDREN'S PRIVACY

Our Services are not directed to children, and we do not knowingly solicit or collect personal information from persons under the age of 18 (eighteen). If we find out that a child has given us personal information, we will take steps to delete that information and terminate the relevant Navi Account.

7. COMMUNICATIONS FROM US

We may from time to time contact you via calls, SMS, emails, and other communication channels to provide you with information pertaining to our Services, notifications on updates vis-à-vis our Services (when we consider it necessary to do so), educational information and promotions. We may also notify you if we need to temporarily suspend the App for maintenance, and keep you informed on security, privacy, or administrative-related communications. By setting up an account on Navi, you consent to us contacting you via call, SMS, push notifications, or through any other communication channel, as we may deem fit.

8. UPDATES TO THIS NOTICE

We may occasionally update this Policy. Use of our Services after an update constitutes consent to the updated notice to the extent permitted by law. Please take the time to periodically review this Policy for the latest information on our privacy practices.