

L&T Financial Services

Data Privacy Policy

Document no. LTFS/DPP/07

Applicable to the following entities

L&T Finance Limited (erstwhile Family Credit Limited)
L&T Infra Credit Limited (formerly known as L&T Infra Debt Fund Limited)

Document Details

	Details	Signatures
Title	Data Privacy Policy	
Version	1.3	
Classification	Internal	
Date of Adoption	30 th June 2018	
Description	LTFS Data Privacy Policy	
Author	Information Security Team	
Review Frequency	Annual	
Review Date	09th Sep, 2021	
Reviewer	CISO (Chief Information Security Officer)	
Approved By	CISO (Chief Information Security Officer)	Mohd Imran <small>Digitally signed by Mohd Imran DN: cn=Mohd Imran, o=LTFS, ou=Information Security, email=mohd@ltsfinancial.com, c=IN Date: 2019.08.20 10:51:42 +05'30'</small>
Owner & Custodian	Information Security Team	

Distribution List

Name
LTFS - Internal Distribution and Appropriate Publication

Version History

Version Number	Version Date
1.3	September 2021
1.2	March 2021
1.1	August 2019
1.0	June 2018

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This Data Privacy Policy sets forth the Reasonable Security Practices and Procedures adopted by LTFS and shall apply to use and disclosure and sharing of individuals Sensitive Personal Data or Information (“**personal information**”) provided by individual to LTFS employee in person, on the website or otherwise. This privacy policy shall be read in conjunction with the terms of use agreed by individual while registering with LTFS for availing its services. LTFS information resources in scope includes Cloud IT environment as well.

1. Consent

LTFS shall obtain individual’s consent in writing/electronically to collect, use, retain or disclose their personal data before for providing Services. Personal information for purposes of this Policy means information that identifies individual, such as individual's Name, Date of birth, Bank Account details, Biometric information, Phone number, Fax number or Email address etc., All or any personal information so provided will be as and on basis and LTFS shall not responsible for the authenticity of the personal information supplied by individual. This personal information which are collected from individual are solely for the purposes connected with the terms of use which has been agreed by individual to provide various services by LTFS.

Individuals have the option to not agree to the collection of personal information. If individual choose not to agree with the policy, individual will not be entitled to use the Services as per the Terms of Use. Individuals can also anytime withdraw the consent individual provided by writing to us at gro@lfts.com and making a request for termination of the services agreed as per the Terms of Use.

2. Purpose:

LTFS needs this minimal information to operate and provide various Services. LTFS uses and discloses individual personal information only as follows:

- To fulfill individual requests for products and services offered and subscribed and accepted by individual
- Collection and storage of biometric information for attendance verification of loan borrower’s customers.
- To deliver to individual any administrative notices, alerts, advice and communications relevant to individuals use of the Service
- Share individual’s information with their group companies and other third parties in so far as required for joint marketing purposes and / or to similar services to provide individual with various value added services
- For market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- To third-party contractors that provide services to LTFS and are bound by these same privacy restrictions;

- To enforce LTFS's Terms of Use;

All such personal information collected shall be retained so long so individuals are having account with LTFS and remain active to avail various services or as may be required under the law. In case of deactivation / termination of the account / services with us, the personal information provided will no longer be used and the same will also get deleted in line with regulatory requirements. Individual shall have the right to withdraw the consent any time by writing to us at gro@lts.com.

3. Update Personal Information:

LTFS encourages individual to update this information as and when there are any changes. Individual are also entitled to review the information provided and ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient be corrected or amended as feasible. However, LTFS shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by individual.

4. Sharing/Transfer/Disclosure of Personal information:

Personal information of the users will not be sold or otherwise transferred to unaffiliated third parties unless otherwise stated at the time of collection or without the approval of the user as the case may be. However, LTFS might share, exchange and disclose personal information of the individual to our partners with prior concern to deliver individual products and services in the manner agreed.

LTFS treats individual's personal information or individual's use of the service as private and confidential and does not check, edit, or reveal it to any third parties except where it is expressly agreed where it believes in good faith, such action is necessary to comply with the applicable legal and regulatory processes, or to protect and defend the rights of other users or to enforce the terms of service. LTFS may disclose personal information where it is under legal obligation to do so or where it is mandated under law. LTFS may transfer sensitive personal data or information to another Indian or overseas body corporate that ensures the same level of data protection that is adhered to by LTFS, if it is necessary for the performance of a lawful contract between LTFS or any person on individual's behalf or where individual have consented to the data transfer.

5. Unsolicited Information:

Except where specifically agreed or necessary for operational or regulatory reasons, LTFS will not send individual any unsolicited information. However, to help individual to take full advantage of the service offerings of LTFS, individual will have the opportunity to indicate whether individual would like to "opt out" of receiving promotional and/or marketing information about other products, services and offerings from LTFS and/or any third parties etc. If the user does not opt out, LTFS may use any email addresses of users to send occasional emails pertaining to the said information. The user can nevertheless unsubscribe from receipt of such emails by following instructions therein or by communicating accordingly to LTFS.

6. Retention of Personal Information:

LTFS shall not retain personal information longer than the purpose for which it is sought is served or is otherwise required under any other law for the time being in force. The information so collected shall be used only for the purpose for which it is collected.

7. Disposal, Destruction and Redaction of Personal Data

LTFS Data Retention and Disposal require managerial approval for the disposal, destruction and deletion of any personal data. Our disposal, destruction and redaction procedures prevent the recovery, theft, misuse or unauthorized access of personal data. For more information regarding this process.

8. Use of Cookies:

LTFS websites may use "cookies" (information stored on individual's computer by individual's browser at our request). "Cookies" is a term generally used for small text files a web site can use to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behavior and compile aggregate data that will allow content improvements and targeted advertising etc. Cookies themselves do not personally identify individual, but they do identify individual's computer. Generally, cookies work by assigning a unique number to the user computer that has no meaning outside the assigning site. Users are also being made aware that LTFS cannot control the use of cookies or the resulting information by advertisers or third parties hosting data on LTFS website. If a user does not want information collected through the use of cookies, there is a simple procedure in most browsers that allows the user to deny or accept the cookie feature.

9. Security of Data

Since LTFS deals with mostly PII data of users, it becomes imperative to protect such information as soon as they are in the LTFS network and the ownership of the data lies with IT Team. Below are the security measures taken to prevent misuse of these type of information.

- LTFS has implemented physical, administrative and technical security measures across the organization which are designed to prevent data loss, unauthorized access to personal data and misuse, disclosure, alteration, damage or destruction of personal data.
- Sensitive PII data are encrypted at rest using strong encryption algorithms. The keys used for such encryption algorithm are stored securely and access to keys are restricted to authorized entities only.
- The transfer of any such data are done over secure channels using SSL.
- We fully understand that the personal data collected from individuals is under our guardianship. Therefore, we train our employees on the privacy policy as well as information security procedures regarding the appropriate access, use, and disclosure of personal data.
- LTFS also conducts periodic risk assessments on our processes, information systems and third parties, including audits of third party facilities and information systems.
- LTFS also conducts third party audit & assessment on periodic intervals for critical vendors
- LTFS has in place an incident response plan with trained personnel to respond to, investigate and mitigate the impact of any incident.
- LTFS also maintains adequate plans for business continuity management, as well as disaster recovery processes for testing databases, servers, information systems and processes that handle personal data.

This Data Privacy policy shall be read in conjunction with LTFS Information Security policies.

10. Quality

LTFS informs individuals that they have a responsibility to provide accurate, complete and relevant information in order to maintain the quality and integrity of all personal data. Individuals may contact our designated personnel for any updates or corrections. Individuals may verify and challenge the accuracy and completeness of their personal data and have it amended or deleted if appropriate.

11. Compliance and Reporting

- LTFS is committed to monitoring and enforcing compliance with this Policy and with applicable privacy laws, regulations and obligations.
- LTFS conducts regular audits of our compliance with applicable privacy policies, procedures, laws, regulations, contracts and standards.

12. Change in Privacy Policy

LTFS reserves the right to change Privacy Policy at any time. Users may note that this Privacy Policy itself and any such change of policy will be effective from the date of posting on the site. Any changes to the policy shall be communicated to the users.

13. Grievances:

In case of any grievances as regards misuse or processing of individuals personal information in a time bound manner, please contact Mr. Vinod Varadan or email at gro@lfs.com. The Grievance Officer shall redress individuals' grievances expeditiously not later than one month from the date of receipt of grievance.

14. Feedback

LTFS welcomes feedback regarding this Policy at infosec@lfs.com. If at any time individual believe that LTFS has not adhered to this Privacy Policy, please send individuals feedback to us and we shall endeavor to resolve the same.

15. Annexures

Document Change Review Updates

Sr. No	Version	Updates	Change Item
1	1.2	Specified Cloud IT environment in the Scope.	Pg.No. 4. Statement before start of Consent
2	1.3	Replaced LTIDFL with LTICL	Pg.No. 1, Applicable Entities