



## **QUICK CASHFLOW CAPITAL PRIVATE LIMITED**

### **PRIVACY & DATA PROTECTION POLICY**

(Pursuant to the Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Digital Personal Data Protection Act, 2023, and RBI Master Directions – Non-Banking Financial Company (Scale Based Regulation) Directions, 2023)

#### **REVIEW & APPROVING AUTHORITY**

Prepared by	Abhijeet K. Singh
Reviewed by	Alok Kedia
Approved by	Board of Directors
Version	Version: V1.0
Approved On	09 <sup>th</sup> October 2025

## 1. Preamble

Quick Cashflow Capital Private Limited (“QCF” / “the Company”) is a company incorporated under the provisions of the Companies Act, 2013 having its registered office at C-193, Anand Vihar, New Delhi-110092 and corporate office at Smart Works, UG Floor, World Trade Tower, Noida Sector-16, U.P 201301 and is registered as Non-Banking Financial Company with Reserve Bank of India. The Company is committed to safeguarding the confidentiality, integrity, and security of all customer data. This Privacy & Data Protection Policy (“Policy”) is formulated in line with regulatory expectations, the Company recognizes that customer trust is paramount and ensures responsible handling of personal and sensitive data across all operations. This Policy provides you with details about the manner in which your data is collected, stored & used by us.

You are advised to read this Policy carefully. You expressly give us consent to use & disclose your personal information in accordance with this Policy.

## 2. Objectives

- Provide transparent communication to customers about data collection, usage, and storage.
- Ensure compliance with applicable laws, RBI Directions, IT Rules 2011, and DPDP Act, 2023.
- Establish robust data security controls to protect against unauthorized access, misuse, or breaches.
- Define customer rights and redressal mechanisms for privacy-related concerns.
- Mandate vendor and third-party compliance with QCF’s privacy standards.

## 3. Applicability

This Policy applies to:

- All customers, guarantors, co-applicants, and nominees of QCF.
- All employees, contractors, service providers, outsourcing partners, and digital lending agents.
- All modes of interaction including physical branches, digital platforms (apps, website, API integrations), and call centers.

## 4. Definitions

“Personal Information” or “Personal Data” means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with them, is capable of identifying such person. It excludes any information that is freely available or any other law for the time being in force.

- Digital Personal Data means any online personal information subject to DPDP Act, 2023.
- Data Principal means the individual whose data is collected (customer).
- Data Fiduciary means QCF, as the entity determining the purpose and means of processing data.

## 5. Collection of Information

We are required to collect information to provide you with the Services, to comply with our contractual obligations and applicable law. We use different methods to collect information from and about you, including, without limitation, through:

- Data is collected only for lawful and specific purposes (loan origination, credit checks, KYC, servicing, recovery).
- Sources include application forms, KYC documents, bureau data, banks, and regulated third-party platforms.
- Explicit consent shall be obtained before processing any sensitive data.
- Collection is minimal and purpose-driven (only necessary data is collected).

You must ensure that all information that you provide us with is accurate, up-to-date, and true. You will be responsible for any errors, discrepancies, or inaccuracies in the information you share with us, except for such information that has been verified through KYC processes set out by applicable law and backed by documentary proof. When you use our services, we make best efforts to provide you with the ability to access and correct inaccurate or deficient information, subject to any legal requirements.

## 6. Use of Information

We will only use Personal Information as permitted under applicable law or pursuant to contractual obligations. Most commonly, the Company will use your Personal Information to perform the services or to comply with a legal/contractual obligation. We use Personal Data without limitation, for the following purposes:

- Credit assessment, underwriting, loan sanction/disbursement.
- Regulatory compliance (KYC/AML, RBI reporting)/ legal compliance.
- Customer service, communication, and transaction alerts.
- Fraud monitoring, risk management, and business analytics.
- Product innovation and portfolio improvement (without compromising confidentiality).
- to provide services to you
- for risk control, fraud detection and prevention
- to improve the functionality of our Services based on the information and feedback we receive from you;
- to send notifications to manage our relationship with you including to notify you of changes to our services, send you information and updates pertaining to the services you have availed, and to receive occasional company news and updates related to us or the services;

Prohibited: Selling, leasing, or sharing customer data for commercial gain.

## 7. Cookies

The Company website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses cookies that are text files containing small amounts of information (this does not include personal sensitive information) which are downloaded to your device when you visit a website in order to provide you a personalised browsing experience. Cookies do lots of different jobs, like allowing you to navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience. These cookies collect information analytics about how you use a website (for example: often visited pages).

We may contact third-party service providers to assist us in better understanding our site visitors. These service providers may use the information collected on our behalf to help us conduct and improve our Services.

Additionally, you may encounter cookies or other similar devices that are placed by third parties on certain pages of the website. We do not control the use of cookies by third parties. All information collected by third party cookies is aggregated and therefore anonymous.

You are free to disable or delete these cookies by changing your web browser settings. The Company is not responsible for cookies placed in Customers' devices by any third party and information collected thereby.

## 7. Disclosure & Sharing

The Company undertakes not to disclose Persona Data/ SPDI to any person, unless such action is necessary to :

- sharing with regulators, auditors, or statutory authorities.
- sharing with credit bureaus, information utilities, and regulated financial partners.
- sharing with third-party vendors (IT hosting, collection agencies, SMS/email providers) under strict confidentiality clauses.
- sharing with outsourcing partners and DLAs (Digital Lending Apps) in compliance with RBI's digital lending framework.
- conform to legal requirements or comply with legal process;

## 8. Data Security & Storage

The Company endeavours to safeguard and ensure the security of the Personal Information using appropriate measures to protect it from unauthorized access, and follow standards prescribed by law. QCF adopts multi-layered security practices including the following:

- Encryption: End-to-end encryption of Personal Data/ SPDI during storage and transmission.
- Data Localization: Personal Data/ SPDI hosted on servers located in India (as per RBI/MeitY guidance).
- Access Controls: Role-based access, multi-factor authentication, and least-privilege principle.

- Monitoring: Regular audits, VAPT (Vulnerability Assessment & Penetration Testing), log monitoring.
- Incident Management: Defined protocol for breach notification to regulators/customers within mandated timelines.

## **9. Data Retention & Deletion**

- Retention aligned with RBI timelines and statutory requirements (e.g., 8 years post-closure for loan records).
- Customers may request rectification or deletion (subject to compliance obligations).
- Secure destruction protocols for expired data (digital wiping, shredding physical records).

## **10. Customer Rights**

Customers are entitled to:

- Access their personal data with QCF.
- Correction/Updation of inaccurate data.
- Consent Management: Withdraw consent (subject to limitations in service delivery).
- Right to be Forgotten (as per DPDP Act, 2023).
- Opt-out from marketing communication.

## **11. Third-Party & Outsourcing Controls**

- All third-party vendors and partners must sign confidentiality and data protection agreements.
- QCF conducts due diligence, periodic audits, and compliance reviews of outsourcing partners.
- Vendors must comply with ISO 27001, PCI-DSS, or equivalent security standards.

## **12. Contact us and Details of Grievance Redressal**

Customers may report privacy/data protection concerns to:

Grievance Redressal Officer  
Quick Cashflow Capital Private Limited  
Smart Works, UG Floor, World Trade Tower, Noida Sector-16, U.P 201301  
Email: pradeep.kumar@qcfcapital.in

Working Hours: Monday–Friday, 10:00 a.m. – 6:00 p.m. (excluding public holidays)

If unresolved, customers may escalate to:

- RBI Ombudsman (Integrated Ombudsman Scheme, 2021).
- Data Protection Board of India (once constituted under DPDP Act, 2023).

## **13. Review & Updates**

We may occasionally update this Policy. By using our services after such update, you consent to updates made to this Policy. We encourage you to periodically review this Policy for the latest information on our privacy practices.