

PRIVACY POLICY

BEST CAPITAL SERVICES LIMITED

Registered Office:

**701, 7TH Floor, Luhadia Tower, Ashok Marg,
C-Scheme, Jaipur 302001.INDIA
CIN NO: U67120RJ1995PLC009942.**

This Privacy Policy reviewed and approved in the Board meeting held on 01.04.2025.

This Privacy Policy ("**Privacy Policy**") describes the practices and policies of **Best Capital Services Limited** ("**BCSL**" "**We**" "**Our**" or "**Us**", as the context may require) in relation to collection, use, processing, storage, retrieving, disclosure, or transfer of your information, including personal information and sensitive personal data or information that BCSL may receive through your access, interaction or use of Our website, namely www.bestcapital.in and the associated android and iOS mobile application, mobile site or any other medium, including the call-center facility through which We offer Our Services (as defined under the **Terms and Conditions**) to you through the Portal (as defined under the Terms and Conditions).

In order to facilitate and provide you (and co-applicants, members, nominees, guarantor if any) with the Services through the Portal, BCSL and third parties as authorised under the Terms need to collect various data and information from you with your prior and explicit consent.

All terms and conditions regarding usage of the Portal and availing Our Services as set out in the Terms and Conditions are incorporated in this Privacy Policy by reference. Capitalized terms not defined in this Privacy Policy will have the meaning as set out in the Terms and Conditions.

User acceptance

By accessing or using the Portal or by availing Our Services, you agree to the terms of this Privacy Policy. The collection, use, processing, storage, retrieving, disclosure, or transfer of your information, including personal information and sensitive personal data or information (collectively, "**Information**") will be in accordance with this Privacy Policy and as required or permitted under applicable laws, including but not limited to the Information Technology Act, 2000 and the rules framed thereunder, as may be amended from time to time ("**IT Laws**") and the regulations, directions, circulars, guidelines or other mandates issued by the Reserve Bank of India ("**RBI**") and as applicable to the Services (collectively, "**Applicable Laws**").

Any Information, which is the subject matter of this Privacy Policy, provided by you or otherwise collected by Us is collected and retained by Best Capital Services Limited that has the registered office at **701, 7th Floor, Luhadia Tower, Ashok Marg, C-Scheme, Jaipur-302001**.

Please read this Privacy Policy carefully to make sure you understand how any Information you provide to Us will be handled. If you use any of Our Services, you will be regarded as having read and accepted this Privacy Policy. By accessing or using the Portal, you expressly consent to Our collection, processing, storage, transfer, use, disclosure and handling of your Information in accordance with this Privacy Policy. If you do not agree with the practices described in this Privacy Policy, please do not provide Us with your Information, or use, access or interact with the Portal and/or avail Our Services.

You hereby represent to BCSL that:

- The Information you provide to BCSL from time to time, is and shall be authentic, correct, current and updated and you have all the rights, permissions and consents as may be required to provide such Information to BCSL.
- Your providing the Information as well as BCSL's consequent storage, collection, usage, transfer, access or processing of the same shall not be in violation of any agreement, laws, charter documents, judgments, orders and decrees.

If you disclose to Us any Information relating to other people, you represent that you have the authority to do so and to permit Us to use such Information in accordance with this Privacy Policy. You must ensure that the Information you provide Us remains accurate and up-to-date at all times.

Your Information will primarily be stored in electronic form however certain data can also be stored in physical form. We may enter into agreements with third parties to store or process your Information or data. These third parties may have their own security standards to safeguard your Information or data and We will, on reasonable basis, require such third parties to adopt reasonable security standards to safeguard your Information.

Information We collect

BCSLs uses the Information collected from you or about you to enable you to receive Services on the Portal. You expressly consent for Us to collect the Information in accordance with and for the purposes set-out in this Privacy Policy. If you choose not to provide Us any of your Information, you may not be able to access the Portal or take benefit of some or all of Our Services. BCSL may collect the following Information and you hereby explicitly consent to the following:

1. Account Information:

When you set up your account on the Portal, We collect your Information, such as your first and last name, referral code used (if any), address details, photo, email addresses, and telephone numbers.

2. Identity:

For certain Services, We may collect identity and Know Your Customer ("KYC") related Information to verify your identity and comply with the customer identification procedures and customer due diligence requirements prescribed under Applicable Laws, such as Permanent Account Number (PAN), photo, Aadhaar related Information (including Aadhaar number, demographic details or Virtual ID) for the purposes of e-KYC authentication with the Unique Identification Authority of India ("UIDAI") and One Time Password / Pin (OTP). Please note that e-KYC authentication and submission of Aadhaar information is not mandatory, and you may submit other identity documents in place of Aadhaar information, to verify your identity as stipulated under KYC Directions, 2016 issued by the RBI.

3. Information to assess credit worthiness:

(a) Students: Education related Information, such as name of college, year of graduation, college ID card, fee receipt;

(b) Salaried individuals: Employment related Information, such as name of the employer, salary, offer letter, employment ID, and email address issued by the employer;

(c) Self-employed: Information related to the self-employment, such as profession, social media links related to your work, work location and income.

4. Financial Information:

We may collect certain financial Information (such as bank account details or other payment instrument details), rental/lease agreement, gas bill, service or transaction related communications for providing the Services.

5. Device:

We may collect Information related to the electronic device you use to access the Portal, such as your devices' internet protocol (IP) address, browser type, operating system and version, hardware model,

software, device type, device ID, unique device identifiers like device international mobile equipment identity (IMEI), serial number, user profile information and date and time at which you visit the Portal or avail the Services. This helps Us to uniquely identify the devices and ensure that unauthorized devices are not able to act on your behalf to prevent frauds.

6. Usage of the Portal:

We may collect Information that you may electronically submit when you post on message boards, or information contained in searches, reviews, ratings or comments that you submit or Information about you from other persons or sources, or the details of your visits of the Portal or usage behaviour on the Portal. Such Information may be used by Us to administer the Portal and compute general statistics regarding the use of the Portal. We may also use this Information to share important or relevant updates and information through email and/or SMS, and also prevent communication that might not interest you.

7. SMS:

We may need access to the SMS functionality in your device for the purposes of onboarding you in relation to certain Services on your device. We may periodically collect transactional SMSs for the purpose of provision of Services like sender names, SMS body, received time and transmit the data to third parties.

This data may be used to understand your income, spending patterns which help us in the credit evaluation and may help us in facilitating higher limits, faster approval rates. We do not read any personal or OTP messages.

8. Camera and microphone:

We may require access to your device's camera and microphone for a seamless experience, for clicking your selfie, to upload photos, or recording your audio/video, for verification or onboarding / KYC purposes, or for uploading any other necessary documents on the Portal.

9. Location:

We may collect and monitor your location details to verify your location and current address, offer you customized promotions, ensure and check serviceability of Services and to identify unusual activity to prevent any fraudulent activity. We collect the location data from you in two ways: (i) when you add your pin code on the Portal; or (ii) when you enable such access from your mobile device. We collect this data only when Our Portal is being used. We do not collect location when app is in background.

10. Storage:

We may require permission so that your documents can be securely downloaded and saved on your phone, and so you can upload any required documents as part of using the Services. This helps in providing a smooth and seamless experience while using the Portal.

11. Feedback Data and Other Data:

We may access and save Information in the following instances:

(a) When you contact Us or We contact you, We may record Information provided by you during such communications or record calls for quality and training purposes;

(b) When you participate in Our referral programs or use any discount codes offered on the Portal and input such data;

(c) When you provide any feedback or comments to Us on the Portal or any other platform.

12. Third Party Information:

We may also work closely with Affiliates (defined below), third party business partners, technical sub-contractors, analytics providers, search information providers, credit information companies, account aggregator etc. and may lawfully receive Information about you from such sources. Such Information may be combined with Information collected on the Portal and such other Information as provided in this Policy.

13. Other Information:

We may also collect your Information via other sources, such as delivery address or contact Information from Our Affiliates and partners, Information from Our payment service providers, public records, publicly available sources or internet sites, vendors, data suppliers and service providers, commercially available marketing lists or registries, telephone directories, social network, news outlets and other related media.

14. Installed Apps:

We may periodically collect metadata information of apps installed on your mobile device which includes the application's name, package name, installed time, updated time, version name and version code of each installed application, understand the usage of applications like VPN, gaming applications on your device to assess for fraud, if any and also to understand your risk profile.

Our Platform may have a link to an authorised third-party SDK which collects Data on our behalf and Data is stored in a secured server to perform assessments. The stored Data is protected and stored by application-level encryption.

Use of your Information

We may use your Information that We collect in accordance with this Privacy Policy and for the following purposes:

1. To enable you to access the Portal;
2. To avail the Services We offer to you, including any associated services;
3. To facilitate payments for the transactions you make using the Services;
4. To create, maintain or update your account and verify your identity;
5. To conduct due diligence and KYC and/or such other verifications as mandated under Applicable Laws;
6. To validate, process and share your KYC Information, nominee details, and other legally mandated Information with other regulated entities, financial institutions, or service providers (including lending service providers) engaged by Us to facilitate the Services or for verification by such financial institution for enabling/providing services.
7. To facilitate or confirm payments made by you in relation to the Services;

8. To enhance your user experience in relation to the Portal or the Services, including customization of the Portal or the Services;
9. To conduct credit checks, screenings, assess your credit worthiness, credit scoring and obtain credit information;
10. To conduct audits, market research, project planning, troubleshooting;
11. To identify and/or detect security breaches or attacks, errors, fraud, money laundering, abuse and other criminal activities, and investigating and taking appropriate remedial action;
12. To provide relevant offers or rewards to you, based on your consumption patterns;
13. To enforce Our Terms and Conditions or this Privacy Policy and resolve any disputes;
14. To provide functionality, analyze performance, fix errors, bugs, and improve the usability and effectiveness of the Portal;
15. To deliver any administrative notices, alerts, advice, notifications and communication relevant to your use of the facilities on the Portal, through social media (including WhatsApp), SMS and other media;
16. To recommend products or promotional offers to you that might be of interest to you, identify your preferences. We may also use your preferences or details regarding your usage of the Portal for marketing and other promotional activities;
17. To comply with Applicable Laws or requests received from regulators, government, law enforcement or judicial authorities under Applicable Laws or Our contract with a third party;
18. To disclose to Affiliates, Our and their employees, agents and representatives on a need-to-know basis to facilitate provision of Services;
19. To carry out Our obligations and enforcing rights arising from any contracts between Us;
20. To help improve quality and design of Our Portal, including to create new features, promotions, functionality and services;
21. To help improve the Services; or
22. To fulfil any other purpose for which you provide Us the Information and/or for any other purpose with your consent.

Sharing of your information

You hereby explicitly consent to share your Information for the following purposes: -

1. With financial institutions and Financial Partners (including but not limited to banks and Non-Banking Financial Companies), credit information companies, RBI or other regulatory agencies, to facilitate provision of Services, or as may be required under Applicable Laws;

2. With vendors or service providers (including lending service providers), business partners, co-lending partners/financial partners of BCSL, Affiliates, to provide you with the Services, facilitate account creation, provide technical or customer support, synchronization of your contacts with the Portal or other software applications, send you communications via emails, messages or tele-call to inform you about the Services, or products, offers or services that may be of interest to you, push notifications to your electronic device on Our behalf, and collect, process and settle payments. We may also use other third parties for activities such as conducting surveys for Us, and may share your information with such third parties;
3. With Our holding companies, subsidiaries, affiliates and other body corporates in Our group (collectively, "**Affiliates**"), which operate under common ownership or control, subject to Applicable Laws;
4. With a buyer or other successor in the event of a merger, restructuring, reorganization, dissolution or other sale or transfer of some or all the assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which your Information may be amongst the assets transferred.
5. With law enforcement agencies, courts, regulators and/or other governmental organizations which have jurisdiction, to ensure compliance with orders or government directives;
6. To enforce or apply the Terms and Conditions, this Privacy Policy and other agreements entered with you; or
7. In any other circumstances where We have your consent for any other purpose disclosed by Us when you provide the Information.

Third party policies

We may work with different third parties in connection with the Portal or for providing the Services. Please be aware that any information provided to any third-party or when you click through or are routed to third-party links while using the Portal, Our Privacy Policy no longer will apply and that We are not responsible for the privacy practices of these third parties.

In general, the third-party service providers used by Us will only collect, use and disclose your information to the extent necessary to allow them to perform the services or activities they provide Us. In such cases, We share the Information securely and use commercially reasonable efforts to ensure that all recipients comply with confidentiality, fidelity and secrecy obligations and sign covenants in this regard.

However, certain third-party service providers (such as banks, financial institutions, co-lending partners, payment aggregators or credit information companies), have their own privacy policies in respect to the information We are required to provide to them. We recommend that you read their privacy policies to understand the manner in which your Information will be handled by them. In particular, remember that certain third-party service providers may be located in or have facilities that are located in a different jurisdiction. So, if you select to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which such service provider is or its facilities are located. Once you leave the Portal or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or the Portal's

Terms and Conditions and in such circumstances the privacy policy of such other website will apply. We will not be liable for any acts or omissions of the third-party service provider.

The list of third-parties collecting Information through the Portal is available on various websites related to this type of services for your reference.

Our security practices and policies

BCSL cannot ensure or warrant the security of any Information you transmit to it and thus, you provide Information at your own risk. Once it receives your transmission, BCSL shall endeavor to make reasonable efforts to ensure security on its systems. BCSL uses standard security practices and procedures such as secure server software and firewalls to protect your Information from unauthorized access, disclosure, alteration or destruction.

BCSL has policies and procedures in place to protect information. All technical and operational security operations are governed and managed through policies. We adhere to all industry good practices on Information and cyber security.

By implementing these Security Practices and Policies, BCSL is deemed to have complied with reasonable security practices and procedures. However, this is not a guarantee that such Information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. To the extent permissible by law, BCSL disclaims any liability related to a security breach or loss of your Information.

In no event, shall BCSL be liable for any special, direct, indirect or consequential damages, including, without limitation, lost profits, loss of business opportunity, loss of data in the event of misuse of the Information provided.

BCSL makes significant efforts to protect against the loss, misuse, and alteration of the collected information. These measures may include the use of secure server technology. The User must be aware that the internet is not completely secure. Therefore, BCSL cannot ensure the security of any Information transmitted to BCSL over the internet, and BCSL does not accept any liability for any unintentional disclosure of Information.

Products and Website are password-protected. The Users must not share the passwords with anyone. You shall not undertake any act which amounts to breach of security, and you shall not try to access password-protected area of the Products and Website without proper authorization.

Retention of data, Withdrawal of Consent & Rectification

You can access and review the Information shared by you, after fulfilling the pending contractual obligations, by getting in touch with Us. You can also withdraw, or revoke consent given to Us to process any Information given by you to Us, by writing to Us at info@bestcapital.in or grievance@bestcapital.in. Also, you can request deletion of your account on the Portal.

You shall have the right to deny consent for use of specific data on the Portal.

We shall not retain your Information and delete the same if it is no longer required by Us and when 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 Information as may be required for audit purpose and/or in accordance with applicable law.

In the event any Information provided by you is inaccurate, incomplete or outdated then you should provide Us with the accurate, complete and up to date Information and have Us rectify such Information at Our end immediately. We urge you to ensure that you always provide Us with accurate and correct Information to ensure your use of Our Services is uninterrupted.

Information of Children

We do not knowingly solicit or collect Information from children under the age of 18 years. Use of the Portal is only available for persons who can enter into a legally binding contract under Applicable Laws.

Modifications

We reserve the right to change, modify, insert, or delete any provision of this Privacy Policy, from time to time, in Our sole discretion, without any prior notice to you.

We encourage you to periodically review this Privacy Policy for the latest information on Our privacy practices. Your use of the Portal or availing the Services after an updated Privacy Policy becomes effective will indicate your acceptance of the updated Privacy Policy.

Cookies

When you visit the Portal, one or more cookies will be sent to the device being used by you to access the Portal. The cookies are either used to improve the quality of the Portal or for storing your preferences as a user, improving search results and tracking user trends. You have the option of disabling cookies via your browser preferences on your device. However, if you disable cookies on your browser, some parts of the Portal may not function effectively.

Contact Us

If you would like to ask about, make a request relating to, or complain about how We process your information, please contact or email Our grievance officer, at one of the addresses below. Our grievance officer will attempt to expeditiously redress your grievances.

For any request, complain, feedback or grievances, please contact: -

Principal Nodal Officer

Name: Ashok Kurup

Address: 701, 7th Floor, Luhadia Tower, Ashok Marg, C-Scheme, Jaipur-302001.

Email id: grievance@bestcapital.in

Contact Number: 919610222263

Grievance redressal Policy: www.bestcapital.in/pdf/Grievance-Redressal-Policy.pdf

Amendment:

Any change in the policy shall be approved by the Board of Directors of the Company. Any amendment in the regulatory guidelines shall prevail and necessary amendment shall be carried out at a subsequent date in the policy. The Board of Directors of the Company shall have the right to withdraw and / or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, subject to applicable laws in force.