

Privacy Policy

Madura Microfinance Limited with its registered office at No. 36,2nd Main Road, Kasturba Nagar, Adyar, Chennai-600020 (hereinafter shall be referred to as “**Company**”, “**Madura**”, “**We**”, “**Us**”, “**Our**” and terms of similar meaning) is engaged in the business of microfinance and owns and operates the website www.maduramicrofinance.com

We at Madura are committed to protecting your privacy and personal information, and this privacy policy (“**Privacy Policy**”) outlines how your Information (*as defined hereinafter*) will be collected, used, processed and shared in connection with your access to and/or use of www.maduramicrofinance.com and any content, features, services, subscriber or membership-based services, or other offerings that Madura may provide in connection therewith including but not limited to emails and newsletters (collectively, the “**Services**”). By using the Services, you consent to the use of your Information in accordance with this Privacy Policy.

As we update, improve and expand the Services and in view of changing technology and legal requirements, this Privacy Policy may change, so please refer back to it periodically as you will be deemed to be governed by the terms of such modified Privacy Policy, as it comes into effect from time to time. If we make a significant or material change in the way we use or share your Personal Information (*as defined hereinafter*), you will be notified via email and/or prominent notice within the Services at least one week prior to the changes taking effect.

Except as maybe specifically mentioned in this Privacy Policy, where applicable, Madura is a “data controller” as defined under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of such Data (“**General Data Protection Regulation**” or “**GDPR**”) i.e. Madura controls and decides the type of Information collected and its use.

In case you have any questions or concerns regarding this Privacy Policy, please contact us at: communications@mmfl.in

COLLECTION OF INFORMATION

To access/utilise the Services, you may be required to provide certain personal, non-personal and other information, as indicated below (such information and correspondences hereinafter collectively referred to as “**Information**”):

1. In order for you to access certain Services, We may require you to provide Personal Information. Personal Information means information that is about any individual, or from which any individual is directly or indirectly identifiable. Personal Information may be freely provided by you, or, in case of usage data, collected automatically when using the Services. you may also optionally provide us with this information through third-party sign-in services such as Social Media platforms and Google. In such cases, we use and store whatever

information is made available to us by you through these sign-in services. Details on each type of Personal Information collected are provided hereunder or by specific explanation texts displayed prior to such Personal Information collection. Personal Information includes the following categories of information: (i) Contact Data (such as your e-mail address, phone number and account details); (ii) Demographic Data (such as your gender, your date of birth, nationality, and zip code) and (iii) Details of consents (records of consents given with the date and time and other relevant information). Please note that the above list is not an exhaustive list and is only an illustrative list. Any comments, messages, blogs, scribbles etc. posted/uploaded/conveyed/communicated by you on the public or comments sections of the Services becomes published content and is not considered personally identifiable information. You are responsible for any third-party Personal Information obtained, published or shared through the use of the Services and confirm that you have the third party's consent to provide such Information to us.

2. Non-Personal Information: When accessing the Services, we may collect certain non-personal information such as your internet protocol address, operating system, and browser type and internet service provider. This type of information does not identify you personally.
3. Automatic Information: To improve the responsiveness of the Services for you, we may use "cookies", or similar electronic tools to collect information to understand your individual interests. A cookie is a small text file that is stored on the computer that enables us to recognize you when you visit Our website, store your preferences and settings, enhance your experience by delivering content and advertising specific to your interests, perform research and analytics, track your use of Our Services, and assist with security and administrative functions. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request, your visits to, and interaction and engagement with, the Services, content and ads on third party websites, applications, platforms and other media channels, log files, web beacons (*tiny graphic with a unique identifier, embedded invisibly on a webpage, an online ad or email, and is used to count or track things like activity on a webpage or ad impressions or clicks, as well as to access cookies stored on users' computers*) and one or more cookies that may uniquely identify your browser.
4. Mobile: When you use the Services through your mobile, we may receive information about your location and your mobile device, including a unique identifier number for your device. We may use this information to provide you with suggestions in respect of Services if required.
5. User communications: When you send emails or other communications to us, we may retain those communications in order to process your inquiries, respond to your requests and improve our Services.

We endeavour to provide you with choices regarding the Personal Information you provide to us. You can set your browser or mobile device to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, or choose to decline to submit any Information, We may not be able to provide you access to the Services or use certain aspects of the

Services. We will not be liable and/or responsible for the denial of providing access to the Services to you on account of the inadequacy of Information provided by you.

Sensitive Personal Information: We do not collect or otherwise process Personal Information about race, religion, sexual orientation or health or any other information that may be deemed to be sensitive under GDPR (collectively, “**Sensitive Personal Information**”) in the ordinary course of our business.

Children: Madura does not knowingly collect any Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information through our Service(s). We encourage parents and legal guardians to monitor their children’s Internet usage and to ensure no Personal Information is provided through our Service(s). If you have reason to believe that a child under the age of 18 has provided Personal Information to us through the Services, please contact us and we will endeavour to delete that information and terminate the child’s account from our databases.

USAGE OF INFORMATION

We may use the Information we collect from you and about you in any one or more of the following manner:

1. To process and fulfil your request for Services;
2. To improve our Services and offerings;
3. To contact you including to send you communications that you have requested or that may be of interest to you by way of emails, or courier, or registered post, or telephone calls, or any other mode of communication;
4. Generate and review reports and data about, and to conduct research on, our user base and Service usage patterns;
5. Provide you with policies about your account;
6. Notify you about changes to our Services;
7. Allow you to participate in interactive features offered through our Services;
8. In any other way We may describe when you provide the Information;
9. To avoid fraud and other prohibited or illegal activities;
10. We may use and disclose Information, in good faith, wherein the access, use, preservation or disclosure of such information is reasonably necessary to (i) satisfy (*which may be without notice to you*) any applicable law, regulation, legal process or enforceable governmental request, (ii) enforce this Privacy Policy, including investigation of potential violations thereof,

(iii) detect, prevent, or otherwise address fraud, security or technical issues, or (iv) protect against imminent harm to the rights, property or safety of the Company, its users or the public as required or permitted by law;

11. For any other purpose with your express consent.

SHARING OF INFORMATION

We do not sell, trade, or otherwise transfer your Personal Information to outside parties. We may disclose Personal Information that we collect or you provide, as described in this Privacy Policy, in the following ways:

1. share Information to other entities within the Company group, for legitimate business purposes (including operating the Services, and providing Services to you), in accordance with applicable law;
2. legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation, for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security;
3. outside professional advisors (such as accountants, auditors, or lawyers), subject to binding contractual obligations of confidentiality;
4. any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights;
5. If you interact with social media features on our Services or use your social media credentials to log-in or post content, these features may collect information about your use of the Services, as well as post information about your activities on the social media service. your interactions with social media companies are governed by their privacy policies;
6. Additionally, in the event of an audit, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Our business, assets or stock (including in connection with any bankruptcy or similar proceedings), We may share/transfer/assign the Information we have collected to the relevant third party.

SECURITY OF INFORMATION

We use reasonable security measures to protect Information from unauthorized access, maintain data accuracy and help ensure the appropriate use/disclosure of Information. These safeguards take into account the sensitivity of the information that we collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. We host the Services

in a secure server environment that uses firewalls and other advanced technology to prevent interference or access from outside intruders.

We assume no liability or responsibility for disclosure of your Information due to errors in transmission, unauthorized third-party access, or other causes beyond Our control you acknowledge that neither the Company nor any of its representatives shall be liable to you under any circumstances for any direct, indirect, punitive, incidental, special or consequential damages that result from or arise out of, or a breach or, or compromise of registration of your account and/or your ability or inability to use the Services.

LAWFUL BASIS FOR PROCESSING INFORMATION

As outlined in this Privacy Policy, Madura will not process your Personal Information without a lawful basis to do so. In general, Madura may process your Personal Information on the legal bases of: (i) consent (where we have obtained your prior, express consent to the processing; (ii) contract (if you have entered into an agreement with us and such processing is a necessary part thereof); (iii) compliance with applicable laws; (iv) to protect the vital interests of any individual. Madura may also process certain Personal Information on the basis of the following legitimate interests, provided that such interests are not overridden by your privacy rights and interests: delivering and continuing to develop and improve the Services, learning from your behaviour on the Website to better serve you and other users, helping us modify or enhance the Services and its content, receiving insight as to what users like or dislike about our Services or aspects thereof, and providing a consistent and secure user experience in connection with the Services.

ACCESS AND DELETION OF INFORMATION

When you sign up for Services, you are opting in to receive emails from other users, businesses, and Madura itself. We will take reasonable steps to accurately record the Personal Information that you provide to us and any subsequent updates. As a user, you have the right to access, correct, delete or transfer your Personal Information that we hold, including registration details.

You can manage your email preferences and follow the “unsubscribe” instructions in informational/educational email messages. If required by you, Madura will delete the Personal Information provided by you in connection with the Services. We will remove your public posts from view, but we may retain information about you for the purposes authorized under this Privacy Policy, unless prohibited by law. Thereafter, we will either delete your Personal Information or de-identify it so that it is anonymous and not attributed to your identity. Upon deletion of your Information, copies of your Information may remain viewable in cached and archived pages or as saved by other users.

In the event, you are located in the European Union (“EU”), you will be asked to provide clear and affirmative consent to the collection, processing, and sharing of your Personal Information, subject to withdrawal of your consent at any time on request, via cookies and similar technologies. Under GDPR, European Union residents have the following rights:

- To know the purpose to process the Personal Information.
- To know the status of Personal Information processed.
- Access the Personal Information that is processed.
- To get erased or rectified the Personal Information.
- Restrict the processing of the Personal Information.
- Data portability of the Personal Information provided in respect of the Services.
- Opt-out option from processing the Personal Information(unless Madura has otherwise compelling legitimate grounds)

The abovementioned rights can be exercised by EU residents by contacting us at communications@mmfl.in.

INFORMATION RETENTION

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria for determining the duration for which We will keep your Personal Information are as follows: (i) We will retain copies of your Personal Information in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Privacy Policy, including for the length of time We have an ongoing relationship with you and provide the Services to you; (ii) if there is a legal obligation to which We are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before We can delete them); or (iii) keeping in view the legitimate interests of Madura (litigation or regulatory investigations).

LINKS TO THIRD PARTY SITES

The Services may include links to third party applications/websites/platforms (“**Third Party Sites**”). Such Third Party Sites are governed by their respective privacy policies, which are beyond our control. Once you leave our website, use of any information you provide is governed by the privacy policy of the operator of the Third Party Site you are visiting. That policy may differ from ours.

YOUR CONSENT

By using the Services and/ or by providing your Information, you consent to the collection and use of such Information in accordance with this Privacy Policy, including but not limited to your consent for sharing your Information as per this Privacy Policy. You specifically agree and consent to us collecting, storing, processing, transferring and sharing Information (including Personal Information)

related to you with third parties, service professionals or to registered business partner/users for the purposes and in accordance with the terms as set out in this Privacy Policy.

Latest update: January, 2019