

Information to Public on Data Privacy policy of the Bank

(Revised in January 2021)

1. Introduction

ESAF Small Finance Bank is committed to ensure the privacy of customer data and information; and to use personal information in a very judicious manner. The Bank is guided by the regulations and best practices in the area of data privacy. If a customer provides certain information with which that customer can be identified personally, he/she can remain rest assured that the information would be used only in accordance with the Bank's Data Privacy Policy approved by the Board of Directors.

2. Definitions

The use of the term "The Bank" refers to ESAF SMALL FINANCE BANK (ESFB).

WEBSITE means website of the Bank with URL: <https://www.esafbank.com> and other sites that can be directly reached by the URL owned by the Bank.

APPLICATION means any Digital Applications of the ESAF SMALL FINANCE BANK (ESFB).

USER refers to persons who access the Bank's Website and/or Digital Applications.

CUSTOMER refers to person doing any transactions with the Bank directly or indirectly.

PERSONAL INFORMATION includes but not limited to, financial information including banking related information, financial and credit information, ethnicity, caste, race or religion, biometric information, email, address, PAN, TAN, payment card information, photographs, etc. However, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other laws in force shall not be regarded as sensitive personal data or information for the purposes of Data Privacy.

PRIVACY POLICY refers to the Data Privacy Policy of the Bank, approved by its Board of Directors.

THIRD PARTY refers to an entity that is not the Bank or its direct customer.

3. Scope & Coverage

The Policy covers all users who interact with the Bank / Website / Digital Applications and whose personal information is collected/received/transmitted/processed/stored/dealt with and/or handled by the Bank. This Policy covers the "sensitive personal data or information" of customers, which are handled by the Bank in any form or mode.

The Privacy Policy does not, however, extend to third party websites / applications linked to the Bank's Websites and Digital Applications.

4. Collection of Information

The Bank collects and uses the financial and personal information from its customers as is required under various regulations and guidelines including the KYC norms prescribed by the Reserve Bank of India. Such information is collected and used for specific business purposes or for other related purposes or for a lawful purpose, to comply with the applicable laws and regulations.

5. Consent

By making available their personal information to the Bank, the customers are deemed to have provided their consent to the Bank to use all such information –

- i. For extending the products or services requested for/applied for or shown interest in,
- ii. To enable the Bank for verification and check,
- iii. To process applications, requests, transactions and/or to maintain records as per internal or legal or regulatory requirements, and/or
- iv. For any other lawful purposes.

6. Usage of Information

The Bank may use Personal Identification Information for the following purposes and/or for any other lawful purposes.

1. To allow customers to apply for products or services and to evaluate customer eligibility for such products or services;
2. To verify customer identity and/or location in order to allow access to accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
3. For risk control, for fraud detection and prevention, to comply with laws and regulations and to comply with other legal processes and law enforcement requirements;
4. To inform customer about important information regarding the products or services for which customer applies or may be interested in applying for, or in which customer is already enrolled, or to convey changes to terms, conditions, and policies and/or other administrative information;
5. For business purposes, including data analysis, audits, developing and improving products and services, enhancing the website, identifying usage trends and determining the effectiveness of promotional campaigns;

6. To allow customers to utilize various features and options provided in our website based on request received from customer devices with access to contact lists, geo-location, etc.
7. To respond to customer inquiries and fulfil customer requests;
8. To deliver marketing communications that may be of interest to customers, including, advertisements or offers tailored to meet various needs of the customers;
9. To personalize customer experience on the site;
10. To allow customer to use some financial planning tools (Information which the customer enters into the planning tools may be stored for future access and use. Customer will have the option not to save the information);
11. To enhance, improve and fine tune the Application and other online services;

Note:

The Bank will not be responsible for content, information usage and privacy policies of linked sites which are not under control of the Bank. Confirmation of authenticity of the personal information provided by the customer will not be responsibility of the Bank.

7. Information Protection

The Bank's customers have access to a broad range of products and services such as basic Banking products, ATM, online Banking, Mobile Banking etc. To deliver products and services effectively and conveniently, it is extremely important that the Bank uses technology to manage and maintain certain customer information while ensuring that customer information is kept confidential and safe.

The Bank is committed to ensure that the information is secure. The collected information data from customer /user will be stored as per regulatory guidelines.

In order to prevent unauthorised access or disclosure, the Bank has put in place physical, electronic and managerial procedures to safeguard and secure the data and information that the Bank collects.

8. Information Sharing

12. The Bank may use and share the information provided by the customers with its affiliates, Business Correspondents and Business Facilitators, Vendors, Recovery and Collection Agencies, other Agencies which are engaged by the Bank in the normal course of business for conduct if its business.
13. The Information may be disclosed without obtaining the customers' prior consent, with government agencies mandated under the law, where disclosure is necessary for

compliance to legal obligations. Any Information could be required to be disclosed to any third party by the Bank by an order under the laws in force.

14. The Bank may be required to disclose the information to one or more agents and contractors and their sub-contractors, but such agents, contractors, and sub-contractors will be required to agree to use the information obtained from the Bank only for specifically stated purposes and will be disposing the information in a secured manner consistent with the Bank's policies.
15. The person / agent / agency requesting the Bank to exchange, share, part with any information related to the details and transaction history of the Covered Persons to its Affiliates or Banks or financial institutions or credit bureaus or agencies or participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis, credit scoring, verification or risk management or any of similar purposes will be required to indemnify the Bank for use or disclosure of the information. Non-Disclosure Agreements will be got executed by the Bank, depending upon the nature of sharing of the information.

9. Retention and Disposal

16. The Bank will retain the information for so long as it is needed by the business. Since most of the information is in continuous use, much is retained on an indefinite basis or for such period as to satisfy legal, regulatory or accounting requirements.
17. When the Bank finds that information collected or stored or transferred is no more in use and if there is no legal obligation to retain such information, the Bank will determine appropriate means to dispose or to de-identify personally identifiable information in a secure manner in keeping with its legal obligations.

10. Contact the Bank

Customers of the Bank can raise queries on this document for any clarifications or for more details, by emailing to the following email ID of the Bank.

infosec@esafbank.com

Alternatively, they may forward the same to the below mentioned mailing address.

The Chief Information Security Officer, ESAF Small Finance Bank, ESAF Bhavan, Mannuthy, Thrissur, Kerala, India -680651.

The set of information as above, regarding the policy of the Bank on Data Privacy is published and made known to the public through our Bank website, in order to ensure transparency and to create awareness.
