

ECOFY FINANCE PRIVATE LIMITED

DATA PRIVACY POLICY

VERSION 2.0

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1. INTRODUCTION

Ecofy Finance Private Limited (formerly known as Accretive Cleantech Finance Pvt Ltd) (hereinafter referred to as “Ecofy”, “We”, “Us”, “Our”, “Data Fiduciary”, “Data Controller”) is an NBFC (Non-Banking Financial Company) providing financial assistance to buyers of various electric vehicles (Two-wheelers & Three-wheelers), Rooftop Solar, SME Loans, amongst others

2. PURPOSE

The following Data Privacy Policy (hereinafter referred to as “Privacy Policy”, “Privacy Notice”, “Privacy Statement” or “Policy”) aims to describes how We collect, use, and disclose information and what choices that the person using the website (hereinafter referred to as “User”, “Data Principal”, “You”, “Your”) have with respect to the information. Through this Privacy Policy We aim to provide a synopsis of our privacy practices regarding the personal information that We collect and process from You through various sources. Although this Policy primarily focuses on the data collected and processed through Our website (<https://www.ecofy.co.in/>), our adherence to these principles is for any data collected by Us, across Our organization.

This Policy aims to reflects Our steadfast commitment to protecting the rights of Data Principals, including our employees, in compliance with the Digital Personal Data Protection Act (“DPDP Act”), 2023 (including the rules, as amended from time to time). We understand that the importance of data protection increases as the amount of data created and stored in the course of business operations, continues to grow at unprecedented rates. We firmly believe that data protection is the cornerstone of building trustworthy business relationships and thus We aims to safeguard all data We collect from potential compromise, ensuring its privacy, confidentiality, and availability. Ecofy is the controller for the personal data discussed in this Privacy Statement, except as noted in Para 3.

3. SCOPE

This Privacy Policy applies to all Our employees, prospective employees, Borrower(s) (i.e. natural person and/or legal entity (ies) who have availed finance from Ecofy. The term Borrower(s) shall include co-borrower(s), guarantor(s) and/or any other party to the executed loan agreement and/or documents) prospective borrower(s), as well as other Users and website visitors. This Privacy Notice also applies to Our prospective customers who visit the website to understand the services provided by Us.

For the purposes of this Notice, a “Visitor” of Ecofy refers to an individual who accesses Ecofy's website with or without registering for an account or who provides personal data to Ecofy, for various purposes, as given in this Policy.

For the purposes of this Notice, “Applicable Law” shall mean all statutes, enactments, acts of legislature or parliament, ordinances, rules, byelaws, regulations, notifications, guidelines, policies, directions,

directives and orders of any government, statutory authority, regulatory authority, tribunal, board or court in India.

For the purposes of this Notice “**Personal Data**” shall mean all the personal and identifiable information collected of an individual.

Ecofy is responsible for safeguarding the privacy of the data provided by users through its own channels. However, third-party service providers that Ecofy may engage with are responsible for collecting data from various sources, including Ecofy's channels. Please read the cookie policy for further details on third-party data collection.

4. DATA PROTECTION PRINCIPLES

The following key principles are enshrined in the Applicable Laws and are fundamental to Ecofy's Policy. In its capacity as a Data Controller, Ecofy ensures that all activities shall abide by the following principles:

- a. Processing shall be performed lawfully, fairly and in a transparent manner.
- b. Personal Data shall be collected for specified and explicit purposes and not further processed in a manner that is incompatible with those purposes; further processing for any other purposes is permissible if they are similar or relevant to the purposes for which such data are originally collected.
- c. Personal Data shall be adequate and limited to what is necessary in relation to the purposes for which they are processed;
- d. Personal Data shall be accurate and, where necessary, kept up to date;
- e. Personal Data shall be kept in a manner that ensures appropriate security of the Personal Data, including protection against any infringement, breach or unauthorised or unlawful processing, using appropriate technical or organisational measures by complying with the Applicable Laws in this regard;
- f. Personal Data shall not be kept after the completion of the purpose for which such data is processed, provided that such data may be further kept if its Data Subject can no longer be identifiable using the “anonymization” technique, or if required by Applicable Laws

5. HOW AND WHEN DATA COLLECTION HAPPENS?

We collect and process Personal Data when the Data Principal:

- 5.1** Visit Our website and provide Us with their details to get in touch or contact Us with Our team and leave a message.
- 5.2** Provide any information to fulfil the contractual (employment) obligation.
- 5.3** Sign up to receive updates from Us via email or media channels.

- 5.4 Use Our app on a mobile device or a web browser to access Our content.
- 5.5 Offline interacts with us via hardcopy application forms or contact Us via email, social media, or any similar technologies.
- 5.6 We may request certain third parties, CIBIL, etc to provide information about you to furnish specific services and authenticate your information.
- 5.7 To use our services, you hereby provide your explicit consent for procuring your credit information from our bureau partners during the onboarding process. Our bureau partners are credit information companies registered under the Credit Information Companies (Regulation) Act 2005.
- 5.8 To access our services you hereby provide your explicit consent to undertake the Know Your Customer (KYC) process, which may entail us and/or our lender partners procuring your KYC data from one or more KYC registries.
- 5.9 To effectuate a financial transaction, we may disseminate financial information provided by you (such as payment mode particulars) to authorized third parties, for instance, our business associates, financial institutions, or government authorities involved in the fulfilment of the said transactions.

6. DATA COLLECTION

We collect the following category of information:

- 6.1 Full Name
- 6.2 Address
- 6.3 Email-address
- 6.4 Date of Birth
- 6.5 Gender
- 6.6 Employment Information
- 6.7 Masked Aadhaar
- 6.8 Driving License
- 6.9 Bank Account Details
- 6.10 Phone Number
- 6.11 City/State

We may also collect Personal Data, namely bank statements, financial information, and KYC details.

7. WITHDRAWAL/ CORRECTION OF CONSENT

If after consenting to share Your Personal Data, You wish to withdraw/revoke/correct your consent for the already shared Personal Data, You may contact us at support@ecofy.co.in, and We will return/destroy/correct Your Personal Data if obtained, subject to the provisions of this Policy and Applicable Law.

8. HOW DO WE USE YOUR PERSONAL DATA?

- 8.1 We collect your Personal Data with the primary goal of providing You with a smooth, efficient, and customised experience. The information enables Us to provide services and features that are

most likely to meet Your needs and make Your experience smoother. All the personal as well as non-personal data collected by Us will be stored in an electronic form, in accordance with provisions of Ecofy's policy on Information Security, IT Act and other Applicable Laws.

- 8.2** Any data collected by Us will be used for troubleshooting and for site maintenance to understand which parts of the website are visited and how frequently, to identify You once You register on Our website, for communication purposes including contacting You or responding to Your queries, to publish testimonials and case studies, to enhance and optimize Our business operations, applications, systems and processes.
- 8.3** We shall exclusively employ Your Personal Data for the designated intentions for which it was acquired unless We reasonably determine that there exists a need to employ it for an alternative rationale that aligns with the original purpose, for which your data was collected. In the event that We necessitate the utilization of Your Personal Data for an unconnected objective, We shall duly inform You and elucidate the legal foundation that permits Us to proceed accordingly and we shall proceed only after you have consented for the same.
- 8.4** Except where specifically agreed or necessary for operational or regulatory reasons, We will not send You any unsolicited information. However, to help the User take full advantage of the service offerings of Ecofy, You will have the opportunity to indicate whether You would like to "opt-out" of receiving promotional and/or marketing information about other products, services and offerings from Ours and/or any third parties end. If the User does not opt out, We 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 Us via support@ecofy.co.in
- 8.5** We may process Your Personal Data in compliance with the above rules, wherever required or permitted by Applicable Law.

9. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We process Personal Data based on one or more of the following processing conditions:

- 9.1 Contractual Necessity:** Personal Data may be processed when it is essential for the performance of a contract to which You are a party or in order to take steps at Your request prior to entering into a contract e.g when You would engage with Us for receiving Our services and offerings.
- 9.2 Legitimate Interest of the Business:** Data processing may occur when it serves the legitimate interests of Ecofy, provided that such interests are not overridden by the rights and freedoms of the Data Principals.
- 9.3 Vital Interest of Data Subject:** In situations where it is crucial to protect the vital interests of the Data Subject, Personal Data may be processed.

9.4 Legal Obligation: Personal Data may be processed to comply with legal obligations to which Ecofy is subject, including Applicable Laws and for protecting Our legal rights, seeking remedies and defending against any adverse claims made.

10. RIGHTS OF DATA PRINCIPAL

Data Principal have certain rights under the data protection laws in relation to the Personal Data held by Us. In, particular the Data Principal may have the following rights:

- 10.1** Right to access information about Personal Data
- 10.2** Right to correction of Personal Data.
- 10.3** Right to be forgotten/ Right to erasure of Personal Data
- 10.4** Right of grievance redressal.
- 10.5** Right to nominate.
- 10.6** Right to opt-in/opt-out for some cookie categories
- 10.7** View list of cookies generated by the website under each category
- 10.8** Access the website even if You opt-out of all cookies

11. RESPONSIBILITIES OF DATA PRINCIPAL

- 11.1** Comply with Applicable Law while exercising rights under DPDP Act, 2023.
- 11.2** Not to impersonate another person while providing details for any specified purpose
- 11.3** Provide only the relevant information on Personal Data
- 11.4** Duty to provide verifiable authentic information while exercising right to correct/erase data.
- 11.5** Must not file false and frivolous complaints with data protection board or with Data Fiduciary as this will lead to imposition of fine and issuance of a warning as per the provisions of the DPDP.

12. DATA STORAGE AND RETENTION

We maintain reasonable administrative, technical, and physical safeguards to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. We retain Personal Data for as long as necessary for the purposes for which it was collected or as per the Applicable Laws. Personal data that is no longer required to be retained as per legal and business requirements will be disposed in a secure manner. The Data collected through this process shall be stored in such jurisdiction and geographies as permissible under the Applicable Law.

13. SHARING PERSONAL INFORMATION OF USER/S

We do not sell, trade, or rent User's personal identification information to others. We may share Your Personal Data with our service providers, post acquiring Your specific consent e.g. Our third-party lenders, etc or Your generic aggregated demographic information not linked to any personal identifiable information regarding User/s with Our subsidiaries, Our business partners, trusted affiliates, and advertisers for the purpose of providing You with the relevant services and personalised experience. We may further do so if We are required by a court order, government authorities, law enforcement authorities, credit information companies or by any other statutory body as per Applicable Law or where

it becomes necessary to do so to protect Our rights or property in order to establish, exercise or defend its legal rights.

14. SECURITY MEASURES

We use appropriate security measures to protect Your data against unauthorised access, alteration, disclosure or destruction. We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of customer personal information. Our security procedures mean that We may ask to verify Your identity before We disclose personal information to You. All data exchanges between the sites and their users happen over an SSL-secured communication channel, which is encrypted and protected with digital signatures. While We take utmost measures to protect the data, You acknowledge that there is no “perfect security” on the internet. The User can send an e-mail to Us on support@ecofy.co.in for enquiring about such third -parties . We use the help of Internet Protocol ("IP") addresses to diagnose any problems with its server and to administer its website including blocking certain addresses that it feels are inappropriately using its website. IP addresses are used to gather broad demographic information, such as browser types, Visitor's country, visiting frequency, operating systems, etc.

15. CONTACT US

Every Data Principal has the right to access their personal data, that is stored by the Data Fiduciary. A Data Principal can make a Data Subject Request (DSR), for the same.

For DSR-related queries, please send an email to support@ecofy.co.in.

The processing of the request may take 30 – 60 days.

For other grievances and queries on Our Privacy Policy or the use of Our services, You may contact Us through email at support@ecofy.co.in

We welcome feedback regarding this Policy at support@ecofy.co.in If at any time You believe that Ecofy has not adhered to this Privacy Policy, please send Your feedback to Us and We shall endeavour to resolve the same.

You may also contact Ecofy at our mailing address below:

**Level-12, Birla Aurora,
Dr. Annie Besant Rd, Worli,
Mumbai, Maharashtra- 400030**

If You have any question about this Policy or wish to contact Us for any reason in relation to Our Personal Data processing, please contact Us at: support@ecofy.co.in

You can also contact our Principal Nodal Officer or Our Grievance Redressal Officer, whose details are given below: -

- a) Principal Nodal Officer Name: **Mr. Nitesh Minocha**
Address: **Level 12, Birla Aurora, Century Bazaar, Dr. Annie Besant Road, Worli, Mumbai – 400030**

Email ID: pno@ecofy.co.in
Contact No: **02269922000**

- b) Grievance Redressal Officer Name: **Ms. Corriena Rub**
Address: **Level 12, Birla Aurora, Century Bazaar, Dr. Annie Besant Road, Worli, Mumbai – 400030**
Email ID: gro@ecofy.co.in
Contact No: **02269922000**

16. CHANGE TO THIS PRIVACY POLICY

This Privacy Statement may be amended or revised from time to time at the discretion of Ecofy. Changes to this Privacy Statement will be posted on the website, and links to the Privacy Statement will indicate that the statement has been changed or updated. The organisation encourages You to periodically review this Privacy Statement for the latest information on its privacy practices.

17. DISCLAIMER

It is hereby clarified that Ecofy does not coerce/ mislead any User to provide its Personal Data through any medium. If the User encounters any communication on behalf of Ecofy for forcefully providing any such Personal Data, then we request such User to immediately inform Ecofy about the same on support@ecofy.co.in or intimate our Principal Nodal Officer or Our Grievance Redressal Officer as per the information provided in this Privacy Policy. The User of this website is bound by the Applicable Law(s) and Ecofy shall not be responsible for any authenticity of Personal Data as submitted by the User. The Data as submitted by the User shall be deemed correct and authentic for consideration by Ecofy.

Usage of this website by the User shall not amount to any rights on the website by the User in any nature whatsoever or the navigation rights of the User on the website shall not be considered as a consent by Ecofy for any transfer of ownership of the website to the User, in any nature whatsoever. The ownership of the website and all the intellectual properties therein, at all times, shall belong to Ecofy Finance Private Limited only.

Date: 13.03.2025

Signature:



Dr. Gopal Gupta (Head Information Security)

ECOFY FINANCE PRIVATE LIMITED

COOKIE POLICY

VERSION 2.0

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1. INTRODUCTION

This is the cookie policy of Ecofy Finance Private Limited (formerly known as Accretive Cleantech Finance Pvt Ltd,) organized and existing under the applicable laws of India having its principal place of business at Lvl-12, Birla Aurora, Dr. Annie Besant Rd, Worli, Mumbai-400050 (hereinafter referred to as "**Ecofy**", "**We**", "**Our**" "**Us**"). By using Our website, (ecofy.co.in) and selecting the appropriate preferences, you consent to Our use of cookies, IP addresses and Our use of other methods to collect website usage data as detailed in this cookie policy (hereinafter referred to as "**Cookie Policy**"). Please read this Cookie Policy together with the privacy policy posted on Our website.

This Cookie Policy explains how Ecofy uses cookies and similar tracking technologies when you use Our website and services. By using Our website and services, you consent to the use of cookies and tracking technologies as described in this Policy. When you visit Our website for the first time, you will be asked to give consent or reject the collection and use of cookies and similar tracking technologies.

2. WHAT ARE COOKIES?

Cookies are small data files stored on your computer or other devices when you visit a website using a browser. They are commonly used to remember your preferences and activity, either for a single session ("**session cookies**") or across multiple visits ("**functional cookies**"). Cookies help ensure a smooth and consistent user experience and enable key functions like account registration and staying logged in.

Cookies can be set by the website you visit ("**first-party cookies**") or by external providers offering services such as analytics, advertising, or content delivery ("**third-party cookies**").

Websites and HTML emails may also use tracking tools like "web beacons" or "pixels," which are small, transparent images designed to gather statistical data on user behaviour. These tools often work alongside cookies for similar purposes, but unlike cookies, they are not stored on your device. Disabling cookies may limit the functionality of these tracking tools, although they may still load.

3. USE OF COOKIES AND SIMILAR TECHNOLOGIES

We use cookies for several different purposes –

- To provide a personalised experience for Our website visitors.
- To collect information on how users interact with Our websites, including what pages are visited most, as well as other analytical data. We use these details to improve how our websites function and to understand how users interact with them. To store preferences set by users such as language, location, or any other preferences so that you do not have to repeatedly make these choices when you visit Our website. To identify and authenticate the user, to ensure only the actual owner of the account can access the account and protect the user from potential security risks as they interact with Our services.
- Some cookies are used to detect spam, fraud, abuse and prevent malicious sites from acting on behalf of the user without the user's knowledge.

- Some of these cookies may be set when a page is loaded or when a visitor takes a particular action (for example, clicking on “Apply Now” or a button on a page or a post).

4. TYPES OF COOKIES WE USE

We use both first-party and third-party cookies on Our website.

First-party cookies are cookies issued from the domain that are generally used to identify language and location preferences or render basic site functionality.

Third-party cookies belong to and are managed by other parties, such as Ecofy business partners or service providers. These cookies may be required to render certain forms, such as the submission of forms, or to allow for some advertising outside of the Ecofy website. These third-party cookies shall also be required for any research and analytics purpose for which Ecofy has specifically consented to.

4.1. Session Cookies

We use session cookies to keep you logged in during your session and persistent cookies to remember your preferences and settings across visits. These cookies are typically retained until they are necessary.

4.2. Essential Cookies

These cookies, often referred to as strictly necessary cookies, play a fundamental role in enabling websites to deliver essential functions and access key features. By allowing us to remember your preferences and deliver relevant content in a secure environment, they underpin core website functionality, including vital features like login authentication and user management. While essential cookies are crucial for seamless operation and accessibility, most browsers do not allow users to disable them through browser preferences due to their necessity for basic website functionality.

4.3. Functional Cookies

These cookies allow a site to remember choices you make (such as your username, language, or region) and provide enhanced, personalized features. They allow remembering information and user preferences such as login data, region, language, and enhanced content but do not track browsing activity across other websites. Disabling these functionality cookies may impact the user experience by preventing certain personalized features from functioning correctly.

4.4. Performance Cookies

These cookies are used to gather insights into your interactions with Our site, monitor its performance, and enhance both Our services and your browsing experience. For instance, they allow us to identify popular features and areas for improvement. You can delete or manage performance cookies as instructed in the Notice.

4.5. Advertising & Marketing

These cookies are used to make advertising messages more relevant to you and your interests.

- a. They also perform functions like preventing the same ad from continuously reappearing.
- b. Ensuring ads are properly displayed, and in some cases selecting advertisements that are based on your interests.
- c. Allowing us and/or third parties to display relevant messages and/or advertising that offer a selection of products based on your viewing behaviour on Our website and certain other websites.

4.6. Storage

We collect and retain this information only till the necessary period to fulfil the purposes for which it is collected, such as providing a better user experience or improving Our website's performance. We do not sell this information to third parties. For more information about how We handle personal information, please refer to our Privacy Policy. If you have any questions or concerns about our use of cookies or personal information, please contact Us.

4.7. Google Analytics:

We use Google Analytics, which is a Google service that uses cookies and other data collection technologies to collect information about your use of the website and services in order to report website trends.

For your ad settings with Google, see: adssettings.google.com; and

Google's ad personalization, see: policies.google.com/technologies/partner-sites.

You can opt out of Google Analytics by visiting www.google.com/settings/ads or by downloading the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout>.

To learn more about Google's advertising policies, see: policies.google.com/technologies/ads

5. REJECTION AND DELETION OF COOKIES

You have the option to block or decline specific types of cookies, or all cookies, set during your visit to Our website by adjusting the cookie preferences available on Our site. Additionally, you can modify your cookie settings for Our websites or those of third-party providers by updating your browser settings.

Please be aware that most browsers are set to accept cookies by default. If you prefer not to allow cookies, you may need to manually delete or block them. You also have the right to opt out of the sale of your personal information as outlined in Our privacy policy.

Even if you choose to reject cookies, you can still access Our websites; however, certain features may not function properly. By continuing to use Our website without rejecting or removing some or all cookies, you agree to Our use of cookies as described. For more information about your rights under applicable laws, including instructions on how to delete or reject cookies, please refer to our privacy policy.

6. UPDATES TO THIS COOKIE POLICY

This Cookie Policy may be updated periodically. We will encourage you to check for changes to this Cookie Policy occasionally, which will be available at: [Green Finance India – EV Electric Vehicle, SME, Solar Loans](#) (ecofy.co.in).

To get further information on Our personal data collection and processing, please check the privacy policy.

On some occasions, We may also actively advise you of specific data handling activities or significant changes to this Cookie Policy, as required by the applicable law.

If you have any questions about this Policy or wish to contact Us for any reason in relation to our personal data processing, please contact us at support@ecofy.co.in.

Date: 13.03.2025

Signature:



Dr. Gopal Gupta (Head Information Security)