



arriba inclusive finance pvt. ltd.

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**ARRIBA INCLUSIVE FINANCE PRIVATE LIMITED**

**PRIVACY POLICY**

# PRIVACY POLICY

## INTRODUCTION

Arriba respects the privacy of individual members availing its products and services. Data is collected only for the purpose specified at the time information is received. The data collected is used for a). Determining the eligibility for accessing loans and other products and services offered by Arriba. b). Reporting that is mandatory for agencies funding the programs. c). Complying with regulations (submission of data to credit bureaus etc.) d). For improving the products and services (member satisfaction surveys or new product development market research). Furthermore, Arriba's use of this data in its possession will always be in accordance with the laws and regulations operative in this regard.

## SCOPE

This policy applies to applicants, members as well as persons employed by or otherwise working for Arriba.

## PURPOSE

Arriba's core values and principles include service to the community, integrity in all of our dealings, professional management systems and appropriate use of technology. To uphold these values and principles—specifically service and integrity—Arriba believes in maintaining secure and transparent data collection. Therefore, this policy covers the proper gathering, processing, use and distribution of client information by Arriba.

## SYSTEM OF PRIVACY

Since Arriba's inception, the processes enumerated here under have been implemented in the organization's effort to maintain transparency and protect applicant and member privacy. Our framework of privacy includes the following:

- The institution shall inform members how and when their information will be shared externally (e.g., shared with a credit bureau). The institution will seek prior permission for any necessary distribution of data beyond what is already agreed as part of documentation between the member & Arriba. Arriba will not share member data with any third party for commercial reasons.
- All employees must be aware of how member data has to be stored and used. The institutional training of employees at all levels will include the policies and procedures for keeping member information secure and private. The code of conduct signed by the staff at the time of induction and thereafter annually will contain an explicit reference to the importance of keeping member data secure and protecting their privacy.
- Files containing member data like the household forms, loan application forms, etc. shall be stored safely and locked up when not in use. Documents related to closed loans and rejected loans should be filed separately. The photograph and KYC documents of rejected loan clients should be returned if the client demands. Access to this information at the branches is strictly for the operations staff and the audit team.

- Internal audit shall explicitly check and report whether physical forms of client data have been stored with adequate security. As part of their field visits, the audit team will also verify if the members understand that their information is confidential, and is maintained as such by the organization.

### **DATA SECURITY**

Arriba has extensive security measures in place to protect digital client information. These include a cloud-based system that is managed in-house (i.e., in-house data center), extensive firewalls and administrative controls for entry into the system, encryption of data transfers as appropriate, role-based access to system applications, access control lists for data managed across the network operating system, hashed password mechanisms, etc. automated server backups, synchronization across regionally distributed network servers, backups to removable media stored in lockers outside the company premises, etc. serve to ensure data availability and business continuity. Internal audit will ensure compliance with digital data security and privacy requirements.

### **BREACH OF POLICY**

All suspected violations of this policy will be thoroughly investigated and may lead to disciplinary action, which may include termination of employment.