

## Privacy Policy | Midfin

The purpose of this Privacy Policy ("Policy") is to inform the users, members, unregistered visitors, etc. (hereinafter collectively referred to as "Users") of the personal information and data being collected, and to protect the personal information of the Users, provided by them to Midland Microfin Limited through the website "<https://www.midlandmicrofin.com>" ("Website") and mobile application "Midfin" ("App") (hereinafter collectively referred to as "Platform") from time-to-time.

This Privacy Policy explains our policy regarding the collection, use, disclosure and transfer of your information by Midland Microfin Limited and/or its subsidiary(ies) and/or affiliate(s) (collectively referred to as the Company), which operates the website ("Site"), mobile applications (Midfin App) and other services including but not limited to recording credit/payment, communicating dues/balances via the site and application, any mobile or internet connected device or otherwise (collectively the "Midfin App Service").

The Company through this Policy aims to demonstrate its commitment towards the Information Technology Act, 2000 and Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information), Rules, 2011 ("Rules").

This Policy is applicable to all the information collected, received, possessed, owned, controlled, stored, dealt with or handled by the platform in respect of a User.

### USER ACKNOWLEDGEMENT AND CONSENT

- User acknowledges that by accessing the Platform, Users expressly consent and confirm to collection, maintenance, usage, handling and disclosures of User information including the sensitive personal data by the Company in accordance with this Policy.
- Please note that by visiting the platform and availing the Services provided by us, you agree to be bound by the terms and conditions of this Privacy Policy.
- User acknowledges that the Platform may contain links to other websites. If a User clicks on a third-party link, the User will be directed to that website. Note that these external sites are not operated by the Company. Therefore, it is strongly advised that Users review the privacy policy of these websites/external links. The Company has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services.
- Users acknowledge that they have the option not to provide or agree to the collection of information. If a User chooses not to agree with the Policy, they will not be eligible to avail services of Midfin.

### 1. COLLECTION OF INFORMATION

- When you use our platform, on your explicit consent, we collect and store your personal data / information. When you use our Platform, whether it is our website or Midfin App, we collect and store your information which is provided by you from time to time only for the purpose as provided herein and We adhere to the best practices to secure information collected from you.
- Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience services. This allows us to provide services and features that meets your needs, and to customize our Platform to make your experience safer and easier and to improve the services provided by us. More importantly, we collect personal information

from you that we consider necessary for achieving the aforementioned purpose and The Personal Information will not be used for purposes other than providing services.

- In general, you can access the website of <https://www.midlandmicrofin.com> or Midfin App without telling us who you are or revealing any personal information about yourself. However, to create an account on the App or the website, as the case may be, you must provide us with certain basic information required to provide customized services.
- Platforms can collect various types of information from and about Users of the Platform, including but not limited to the following :
- Personal Data and Information collected directly

### **Personal Information**

The personal information that we collect depends on the context of your interaction with us and services, the choice you make, and product and feature you use. The personal information we collect may include the following:

- Name
- Phone numbers
- Mailing address
- Usernames
- Passwords
- Contact or authentication data
- Billing address
- Location
- Loan details
- Personal information includes any information concerning the personal or material circumstances of an identified or identifiable User, e.g. name, e-mail address, gender, date of birth, postal address, phone number, a unique login name, password, password validation, and other details shared via application form or via email or via any other medium.

It can also include information such as username, account number, password and any other personally identifiable information. It includes identification documents issued by government or other authorities,

While you can browse some sections of our Website without being a registered member as mentioned above, most activities (such as Bill Repayment services on the Website and the App) requires registration and for you to provide the above details.

We will indicate the mandatory and the optional fields against the information requested from you. You always have the option to not provide your personal information by choosing not to use a particular service or feature on the Platform

### **Collection of Device Information:**

The information the App collects, and how that information is used, depends on how you manage your privacy controls on your device.

When you install the App, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the App and explicitly seek permissions from you to get the required information from the device.

The information we collect from your device includes the unique ID i.e. IMEI number, information on operating system, SDK version and mobile network information including carrier name, SIM Serial and SIM Slot, your profile information, list of installed apps, Wi-Fi information.

We collect information about your device to undertake fraud detection, provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behavior, thereby allowing us to improve our services and provide an enhanced customized user experience to you. You can change the device access you provide to us in your device settings. The key information collected from the device is further detailed below:

#### **- Location**

We collect location information to fetch nearby billers.

#### **- Storage**

We require the storage information permission to enable the App to enable you to upload photos and/or documents to complete the application form, if and as required, during your bill repayment.

#### **Collection of Other Non-Personal Information:**

##### **Additional Information**

We automatically track certain information about you based upon your behavior on our Platform. We use this information to do research on our users' demographics, interests, and behavior to better understand, protect and serve our users and improve our services. This information is compiled and analyzed on an aggregated basis.

We also collect your Internet Protocol (IP) address and the URL used by you to connect your computer to the internet, etc. This information may include the URL that you just came from (whether this URL is on our Website or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, and your IP address.

#### **Cookies**

Platform may use "cookies" as required on the Website. "Cookies" is a term generally used for small text files a web site uses to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising, preferences etc.

Cookies themselves do not personally identify the User, but it identifies User device. Generally, cookies work by assigning a unique number to the computer that has no meaning outside the assigning site.

For the purpose of this Policy Users are informed that cookies also exist within mobile applications when a browser is needed to view certain content or display an ad within the application.

Users are being made aware that Midfin cannot control the use of cookies or the resulting information by advertisers or third parties hosting data on Midfin's Platform. If Users do not want information collected through the use of cookies, they may change the settings in the browsers that allows to deny or accept the cookie feature as per User discretion and in the manner agreed by them.

## **Web Beacons**

The web pages of the website contain electronic images known as "web beacons", sometimes called single-pixel gifs and are used along with cookies to compile aggregated statistics to analyse how the website is used. Web beacons may also be used in some of the Company emails so as to know which emails and links recipients have opened, allowing it to gauge the effectiveness of its customer communications and marketing campaigns.

## **2. MODE OF COLLECTION OF INFORMATION**

- Information that the User provides to the Company by filling in registration / enrollment / signing up forms on the Platform
- Information that the User provides to the Company over telephone. The Company may make and keep a record of the information shared by the Users..
- Information that the Users provide by completing surveys, poll, sweepstakes, contest or promotion scheme;
- Information that the User provides merely by accessing/navigating the Platform.
- Information collected by the Company through independent third-party sources.
- Information collected through Your mobile / hand-held device.

## **3. USE OF USER INFORMATION**

- By submitting User information to Midfin, User expressly acknowledge and consent to use of such information in a manner specified under this Policy. User information can be used for various purposes including without limitation the following:
- Verifying User identity;
- Facilitate User with usage of Platform;
- To obtain billers/services providers from Midfin;
- For fraud prevention and detection;
- To send User surveys and marketing communications that Midfin believes may be of User interest;
- To diagnose technical problems, provide support and help Users in addressing troubleshoot problems;
- To prepare reports, review and filing as per applicable laws;
- To understand User preferences, requirements;
- To permit User to participate in interactive features offered through the Platform;
- Verifying User identity;
- To improve the content and protecting the integrity of the Platform;
- To increase / improve the products / services offered on the Platform;
- To ensure compliance with all applicable laws.

## **4. DISCLOSURE OF INFORMATION**

- Except as required under applicable laws or pursuant to a court / government order, any information or data shared by us with third parties shall be disclosed pursuant to a confidentiality agreement which inter alia restricts such third parties from using the said data only for the purpose of provisioning the services to us to enable us to provide Services to you and also restrict further disclosure of the information unless such disclosure is for the purpose as detailed under that confidentiality agreement. We will share your information with third parties to facilitate provisioning of services by us to you only in such manner as described below:
- We may disclose your information to partners for fetching biller or other services ;
- We may disclose your information to our third-party service providers for providing the Services as detailed under the Terms & Conditions;

- We may share your information with our third-party partners in order to conduct data analysis in order to serve you better and provide services on our Platform;
- We may disclose your information, without prior notice, if required under any law or if we are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority, or in order to enforce or apply our terms of use or assign such information in the course of corporate divestitures, mergers, or to protect the rights, property, or safety of us, our users, or others.

## **5. DATA PROTECTION, RETENTION AND STORAGE**

- Pursuant to Information and Technology Act, 2000 and Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, The Company endeavours to protect sensitive personal and personal information and data of the Users.
- We store and process your personal information on cloud servers. Some of the safeguards we use are firewalls and bit data encryption using SSL, and information access authorization controls. we use reasonable safeguards to preserve the integrity and security of your information against loss, theft, unauthorized access, disclosure, reproduction, use or amendment. To achieve the same, we use reasonable security practices and procedures as mandated under applicable laws for the protection of your information. Information you provide to us may be stored on our secure servers located within or outside India.

## **6. UPDATE USER INFORMATION**

- Users are required to update their information available with the Company as and when there are any changes. Users are also entitled to review the information provided and ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient be corrected or amended as feasible.

## **7. INTELLECTUAL PROPERTY RIGHTS**

- All content on the Platform, including graphics, text, icons, interfaces, audio clips, logos, images, reviews, comments and software is the property of the Company and/or its content suppliers and is protected by Indian and international copyright laws and other applicable intellectual property laws. Any use, including the reproduction, modification, distribution, transmission, republication, display or performance, of the content on this Platform can only be made with the express written permission of the Company. All other trademarks, brands and copyrights other than those belonging to the Company, belong to their respective owners and are their property. Users shall not modify the paper or digital copies of any materials that are printed off or downloaded in any way on or from the Platform, and Users must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text.
- USERS MUST NOT USE ANY PART OF THE CONTENT ON THE PLATFORM FOR COMMERCIAL PURPOSES WITHOUT OBTAINING A WRITTEN LICENCE TO DO SO FROM MIDLAND MICROFIN LIMITED OR ITS LICENSORS. IF THE USER PRINTS OFF, COPY OR DOWNLOAD ANY PART OF THE PLATFORM IN BREACH OF THE TERMS HEREOF, THEIR RIGHT TO USE THE PLATFORM WILL CEASE IMMEDIATELY AND USER SHALL, AT ITS OPTION, RETURN OR DESTROY ANY COPIES OF THE MATERIALS MADE, THEREOF.

## **8. CHANGES TO PRIVACY POLICY**

- In the event the Company modifies this Privacy Policy, the same will be updated on the Platform. In case of any material changes to the Policy, the Users will be notified by means of a notice on Platform prior to the change becoming effective. The Users are encouraged to periodically review this page for the latest information on Company privacy practices.
- We may also make reasonable efforts to inform you via electronic mail. In any case, you are advised to review this Privacy Policy periodically on the Site to ensure that you are aware of the latest version.

## **9. GRIEVANCE REDRESSAL OFFICER**

In accordance with the relevant provisions of the Information Technology Act, 2000 and Rules made thereunder, Company has designated the Grievance Officer. Users can contact the Grievance Redressal Officer with respect to any complaints or concerns regarding the handling, storage, disclosure of User Information.

All queries, disputes, issues and questions regarding the Privacy Policy can be addressed at the following:

**Grievance Officer Name: Mrs. Parminderjit Kaur**

Email address: Ms. parminderjit.kaur@midlandmicrofin.com

Mob No: +91 181-5076000

The Grievance Officer can be contacted between 09:00 a.m. to 05:30 p.m. from Monday to Saturday except on public holidays.

Midland Microfin Limited

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